



department for
**culture, media
and sport**

World Heritage for the Nation: Identifying, Protecting and Promoting Our World Heritage

Government Response to a Consultation

January 2010

Our aim is to improve the quality of life for all through cultural and sporting activities, support the pursuit of excellence, and champion the tourism, creative and leisure industries.

Contents

Introduction	4
Summary of Responses to the Consultation	6
Part One: Future Nominations for World Heritage Site Status	7
Part Two: Managing Current Sites	10
List of Organisations Responding to the Consultation	24

Introduction

The UK Government has conducted a review¹ of its United Kingdom (UK) World Heritage Policy in consultation with Devolved Administrations², Overseas Territories and Crown Dependencies. The aim was to help determine whether the UK should continue to nominate sites for inscription on the World Heritage List³ and what more we should do for existing sites. The review considered the UK's approach to World Heritage, the costs and benefits of World Heritage status, informed by research⁴ undertaken by PricewaterhouseCoopers (PwC), on the management, protection and funding of sites, and the policy for future nominations.

The review was undertaken in the light of the need to re-examine the UK Tentative List of sites for future nominations, published in 1999, in line with United Nations Educational, Scientific and Cultural Organisation (UNESCO) policy and increasing pressure from other UK sites aspiring to World Heritage inscription to be included on the Tentative List. At the same time UNESCO has asked countries well represented on the current World Heritage List to slow down the submission of nominations in order to address thematic gaps on the List and the imbalance between the number of cultural and natural sites and sites in developed and developing nations on the List. Further information on the Global Strategy is on the UNESCO website⁵.

The Consultation

The review paper, "World Heritage for the Nation: Identifying, Protecting and Promoting our World Heritage", was published for consultation in December 2008. The paper set out proposals for the future identification, protection and management of World Heritage Sites and asked for views on two key questions: which option we should adopt for future

¹ "World Heritage for the Nation: Identifying, Protecting and Promoting our World Heritage" Consultation paper available on DCMS' World Heritage Portal at <http://www.culture.gov.uk/ukwhportal/>

² Department for Culture, Media and Sport in conjunction with Historic Scotland, Cadw and the Northern Ireland Environment Agency

³ Final decisions on sites nominated to UNESCO for World Heritage status are taken by the World Heritage Committee at its annual meeting. Successful sites are inscribed onto the World Heritage List and become World Heritage Sites.

⁴ The costs and benefits of World Heritage status, full report and research papers are available on <http://www.culture.gov.uk/ukwhportal/>

⁵ <http://whc.unesco.org/en/globalstrategy/>

nomination of sites for World Heritage inscription; and what further measures should be considered to improve the management and promotion of our World Heritage Sites. Full terms of reference are included in the consultation paper.

A total of 117 responses were received of which 96 were from organisations, listed at the end of this document. 21 individuals also responded, of which 14 were promoting particular sites. DCMS is grateful for all the valuable responses that we received from a wide range of contributors.

This document provides a summary of the responses to the public consultation and the Government's response to the various points made in relation to how we manage World Heritage Sites in the UK. Having considered all this information very carefully the Government has now decided to proceed to draw up a new UK Tentative List.

The current Tentative List is now closed and applications will be invited shortly from all sites who seek a place on the new Tentative List. Many of the remaining sites on the current Tentative List have not actively pursued World Heritage status for some years. They may no longer have local support or may stand little realistic chance of inscription. Those sites which do still wish to progress to nomination should apply for a place on the new list, if they believe they can meet the tests set out in the application process. Those sites which really do have the required qualities will have a good chance of a place on the new UK Tentative List.

An application pack, including an application form and guidance on how to complete it, will be published shortly. The application form covers all the essential evaluation criteria so that it will be possible to determine whether sites have the qualities necessary for successful inscription as a World Heritage Site and can meet UNESCO's aspirations for the future of the World Heritage List.

We are appointing an independent expert panel drawn from across the UK to include experts on a range of heritage sites, from historic buildings, archaeology, cultural landscapes and natural heritage sites, to advise Ministers on the applications. The selection process will be rigorous, with a view to identifying at an early stage, those applications which have a strong likelihood of success. The cost of preparing nominations is significant, so sites which do not clearly meet the tests should be informed of this as soon as possible thereby avoiding a waste of resources in preparing nominations which will not meet UNESCO's requirements.

We are proposing to submit a new Tentative List to UNESCO in 2011, with a view to re-commencing nominating from 2012. Following this, we propose to continue to make nominations to the World Heritage List, though not necessarily every year.

Summary of Responses to Consultation

This report sets out some of the main issues raised by consultees during the consultation period which ran until 25 February 2009 and the Government response to them. The report is set out in two sections:

Part One: Future Nominations - Consultation responses and Government response

Part Two: Managing Current Sites – Consultation responses and Government response

A detailed analysis of UK-wide responses⁶ to the consultation, commissioned by English Heritage, was undertaken by the Centre for Applied Archaeology, University College London, is available alongside this report and can be seen at: <http://www.culture.gov.uk/ukwhportal/>

117 responses to the consultation were received, 96 responses from organisations and 21 responses from individuals whose names are not published for reasons of confidentiality. A list of the organisations that responded is shown at the end of this document.

⁶ "World Heritage for the Nation: Identifying, Protecting and Promoting our World Heritage. Analysis of responses to the policy review." Kirsty Norman, Centre for Applied Archaeology, UCL May 2009.

Part One: Future Nominations for World Heritage Site Status

Informed by the views of the World Heritage Committee, its Advisory Bodies and research findings, including the costs and benefits identified by PwC, the first question posed by the consultation document was:

‘Given the factors we have set out in this document, which of the following options should we adopt in relation to the future nomination of sites to the World Heritage List?’

The options were;

- i) Continue to nominate annually from our existing Tentative List
- ii) Suspend new nominations for a period and focus instead on making the most of the sites we already have; or
- iii) Draw up a shorter and more focused Tentative List, streamlining the application process and spacing out our nominations so that we are not necessarily proposing a new site each year
- iv) Consider alternative designations such as a National Heritage List or the European Heritage label

The consultation responses and the Government response to them can be summarised as follows:

Option i) continue to nominate annually from our existing Tentative List
There was very little support for continuing to nominate annually from the current Tentative List. However, a few responses noted the quality of this List and were concerned that in not promoting the remaining sites this could undermine their value and support.

The current UK Tentative List was published in 1999 with 25 sites, 10 of which have since been inscribed on the World Heritage List. Over the same timescale, we have extended three existing sites: St Kilda to include the maritime areas around it, Gough to include Inaccessible Island, and Hadrian's Wall, to include the Ober-Germanische Raetische Limes in Germany, and the Antonine Wall in Scotland to form the new transnational site, Frontiers of the Roman Empire, which is now on the World Heritage List. We consider that continuing to nominate annually from the current Tentative List is unlikely to be a worthwhile option, since it would combine the high cost of developing a World Heritage bid with a low likelihood

of success as UNESCO's priorities for World Heritage have evolved and changed. This view was confirmed by the majority of responses.

We note concerns raised about the sites remaining on the Tentative List, and that failure to nominate these sites could undermine stakeholder support for these sites. However, many of the remaining sites are dormant; have not actively pursued World Heritage status for some years, may no longer have local support, or may stand little realistic chance of inscription. Taking account of the high cost of preparing nominations and the obligations that follow from inscription, some sites will not want to go forward. We will consider applications from those that wish to be included in the new Tentative List along with other new sites

Option ii) suspend new nominations for a period and focus instead on making the most of the sites we already have

There was also very little support for ceasing nominations altogether, but some support for spacing out nominations, to enable more resources to be deployed on managing our existing World Heritage sites. Respondents generally wanted more support for these sites. Several responses indicated that the UK should consider stopping nominations only when all sites on the UK Tentative List which demonstrate Outstanding Universal Value have been nominated for World Heritage status. There was some support for stopping nominations because, it was argued, too many nominations can undermine the value of World Heritage inscription.

We do not believe, in line with the overwhelming opinion of respondents, that we should cease nominations altogether. The UK contribution to the work of the World Heritage Committee in implementing the Convention is very valuable. The social and economic benefits which can be associated with heritage at local, regional, national as well as at the international level are important and depend on promoting the profile of the UK's cultural and natural heritage. We believe there is a clear case for continuing to put forward nominations.

Option iii) draw up a shorter and more focused Tentative List, spacing out our nominations so that we are not necessarily proposing a new site each year and introducing a two-stage application process to filter out early those sites unlikely to be successful.

There was overwhelming support for the preferred option: that a new Tentative List should be drawn up and that this should involve very careful screening of possible applications so that all the sites on the new list have a very realistic chance of success.

However, as with option i) the responses did show concern that some of the remaining sites on the current Tentative List have already invested time and resources in preparing their nominations and some had considerable local support. Some felt that these sites should be given priority over new applications for the new Tentative List, if they can demonstrate they meet the various requirements.

The PwC study notes that if a process could be established which was shorter and more explicit, with bids being removed earlier from the process and a tighter pipeline of fewer potential sites then this would reduce costs for all concerned.

Many respondents acknowledged that concepts of heritage values change over time and there is a need to create a representative, balanced and credible World Heritage List in line with UNESCO's Global Strategy⁷. As active participants in the World Heritage Convention, respondents agreed that it is desirable for the UK to contribute to filling the gaps on the World Heritage List by considering sites for the national Tentative List which more fully reflect the recommendations of the World Heritage Committee's Advisory Bodies, International Council on Monuments and Sites (ICOMOS)⁸ and International Union for Conservation of Nature (IUCN)⁹.

Option iii) is the Government's preferred option. We consider that nominations for World Heritage status should be spaced out over the next few years, with sites selected from a new, shorter and more focused Tentative List. This would mean that we would no longer routinely make a nomination every year.

A clear but stringent application process has been devised in order to filter out at an early stage those sites unlikely to be successful. Our aim is to streamline the application process by focusing on Outstanding Universal Value and providing clarity from the outset about the criteria to be met, gaps to be filled, and the likely costs and benefits of the process for aspirant sites. There are obvious challenges in producing a shorter Tentative List at a time when interest in World Heritage status is increasing, but we believe that with greater understanding of the World Heritage Committee's priorities, and more information about the potential costs and benefits of applying, potential bidders will consider more carefully whether their site has the qualities necessary for a nomination that would succeed to be inscribed as a World Heritage Site. Sites wishing to be included on a new Tentative List will have to demonstrate a case for Outstanding Universal Value at the outset and present robust evidence for proceeding to nomination.

Option iv) consider alternative designations such as a National Heritage List or the European Heritage Label.

There was no clear support for the idea of alternative designations such as the European Heritage Label or a putative National Heritage List, because resources that would have to be deployed on other such schemes would simply reduce the resources for already hard pressed World Heritage Sites, and the benefits of these alternative designations was not clear.

The Government agrees that these proposed designations do not offer a viable or worthwhile alternative to inscription on the World Heritage List.

⁷ <http://whc.unesco.org/en/globalstrategy>

⁸ http://www.international.icomos.org/world_heritage/index.html

⁹ http://www.iucn.org/about/work/programmes/wcpa_worldheritage/

Part Two: Managing Our Current Sites

The second question posed in the Consultation was:

‘What further measures should be considered to improve the management and promotion of our World Heritage Sites?’

There were many helpful comments and positive suggestions for the future protection, management, promotion and funding of our World Heritage Sites. Many of these comments focused on the need for more joined up approaches to World Heritage across Government as a whole and also more coherent approaches, (for example on protection), between the various parts of the UK. Inevitably there was a demand for more funding for World Heritage Sites. The comments have been grouped by subject and are followed by the Government response.

PROTECTION

UNESCO Policy

Each State Party should set out a statement of how it intends to take action on the UNESCO values ascribed to a Site on inscription, in its Tentative List documentation, to be included in inscription documentation.

In line with UNESCO policy, applications for a place on a new UK Tentative List will have to outline proposals for managing the Outstanding Universal Value and, in due course, this should also be covered in the Management Plan. This is an essential part of the process.

The impact of potential development on World Heritage Sites needs to be considered nationally and internationally. There is a need to achieve greater clarity with UNESCO and its advisors on what is and what is not acceptable to them.

There is a range of possible threats to World Heritage Sites, including climate change and inappropriate development. Managing development which might affect the Outstanding Universal Value is a key issue in terms of World Heritage, both for potential new sites and for the management of existing sites and it is the potential impact of development on that Outstanding Universal Value that is important. Development in or near a site which is not relevant to the Outstanding Universal Value is not of concern to UNESCO. UNESCO is developing guidance, for example, on how to assess and manage the impact of development in historic urban and rural settings.

Buffer zones must be relevant and proportionate: there should be no automatic assumption of a zone of a certain size e.g. a 10 mile Buffer Zone around Hadrian's Wall.

The buffer zone around Hadrian's Wall varies greatly in its width and is based upon a careful assessment of potential visual impact. Most World Heritage Sites benefit from buffer zones since they can greatly assist the protection of the setting, but the need for a buffer zone, and its extent, varies according to the nature of the site. The Government considers the need for a buffer zone during the development of a nomination. It is UNESCO policy that where no buffer zone is deemed necessary a nomination should include an explanation as to why one is not required.

UK Heritage Protection Policy: General

UK policy and guidance should incorporate and define the concepts and terminologies of the international heritage community. UK policy for listed buildings and conservation areas does not mention "values", "authenticity" or "integrity", and "authenticity" is not officially defined.

There is not one single international heritage community, using one set of terms and concepts to describe the heritage. It is also not necessary for the UK to use the same terminology and concepts as other countries. While we do so when we are describing heritage issues at an international level, such as World Heritage, our national heritage assets are not the same as World Heritage and do not have to conform to the requirements of the Convention. Different terms are also used in different parts of the UK, reflecting different approaches. This is to be expected.

There should now be further review of UK policy and guidance in order to bring it in line with international expectations and standards.

It is not necessary or appropriate to carry out a further review of UK policy to bring it into line with international expectations. The UK is already signatory to the main international heritage conventions, such as the Valletta, Granada and World Heritage conventions and heritage policy across the UK already takes full account of these international instruments. At the same time, as far as managing heritage throughout the UK is concerned, this is a devolved matter and policy and legislation is designed to meet local needs and priorities in the different parts of the UK.

The UK should have instruments in place that protect urban sites holistically, in order to avoid what is seen to have been a disproportionate degree of interest from the World Heritage Committee in recent years, about their protection. This should include the avoidance of using methodologies based on selective views e.g. English Heritage's "Seeing the History in the Views" consultation.

Legislation and the planning system together protect both urban and rural sites throughout the UK. Every situation, such as a planning proposal, has to be assessed and dealt with according to the various issues raised. It is not always straightforward to judge the impact of planning proposals and to balance the possible benefits, but that is what the UK system tries to do. Appropriate policies for protection of each World Heritage Site should be included in the core strategy/ development plan or the equivalent. Such policies should focus on the Outstanding Universal Value of the particular World Heritage Site.

Perceptions of the purpose of World Heritage Site status should be refocused more strongly towards conservation.

In accepting the inscription of a World Heritage Site there is a commitment from the State Party and the site managers to manage it sustainably to protect all the values for which it was inscribed on the World Heritage List. One of the benefits identified by the PwC study is that in many World Heritage Sites, enhanced conservation and protection have been a consequence of inscription.

It should be emphasised in Government advice that competing and other interests must come second to the needs and protection of a World Heritage Site itself.

While Government, both at UK level and in the Devolved Administrations are committed to maintain and protect our World Heritage Sites, the competing demands of heritage management and, for example, development or visitor pressures, must be considered carefully and in context. In each case the decision should be informed by a full understanding of the Outstanding Universal Value of the site so that decisions on proposals for development which might affect a site can be made on the basis of a proper understanding of any implications for the World Heritage Site.

Other impacts which do not have to go through the planning system (such as road works and transport projects) need to be controlled.

Planning for major infrastructure development takes full account of potential impact, whether on a World Heritage Site or not. As with any development, the impact on the qualities which underpin the World Heritage status are considered very carefully. However it is the impact on the Outstanding Universal Value which is relevant.

There is a need to ensure that the utility companies comply with standards to be adopted in the Supplementary Planning Document, including in relation to paving materials and other hard landscaping. One option could be to allow Local Authorities to impose a levy on companies so that qualified craftsmen can be employed to carry out necessary remedial work.

As far as utility companies in England are concerned, it is Government policy for Local Authorities to have a specific policy for the protection of World Heritage sites in their Core Strategy supplemented as necessary by supplementary planning guidance and this policy should be followed. This should enable any World Heritage Site to be taken full account of in determining planning developments. However, most works by utility companies are permitted development and therefore beyond the control of development plans and the conditions on planning permission.

Protection and management regimes should not vary greatly between sites on the World Heritage List and those for whom the door is shut. St. Paul's Cathedral should be protected no less than Canterbury Cathedral. This would show full commitment to the World Heritage Convention, take away pressure to add new sites to the World Heritage List, and eliminate perceived or actual anomalies between the designation of sites of equal heritage value within the UK and renowned as such worldwide.

An understanding of the importance of any site is essential for it to be managed sustainably to protect its important qualities, while contributing to the wider values of the communities within which it sits. Very complex sites will have more complex management regimes than others – and that is right. This applies whether a site is listed under national legislation, or is inscribed as a World Heritage Site.

Statutory Protection

There should be statutory measures for the protection of World Heritage Sites and this should be implemented through the passing into legislation of the Heritage Protection Bill, which would introduce a Register of Heritage Assets.

The UK has one of the strongest and well-developed systems of planning control in the World. The World Heritage Committee accepts that the UK planning framework and designations provide adequate protection for our cultural World Heritage Sites. Nevertheless Government is taking forward a number of measures to strengthen the way protection works through clarifying aspects of World Heritage status and the roles and responsibilities of key parties charged with managing our World Heritage Sites.

Throughout the UK, the Devolved Administrations and English Heritage provide advice to Local Authorities and others on the management of World Heritage Sites. Although Parliamentary time has yet to be found for the introduction of an England and Wales Heritage Protection Bill, three further changes have been introduced in England.

- Inclusion of World Heritage Sites in the General Permitted Development Order (GPDO)¹⁰ to minimise the incremental impact of small changes on a World Heritage Site
- Changes to the Call-In Regulations to require referral by local authorities to the Secretary of State of planning applications where they are minded to grant planning permission in circumstances where English Heritage have objected on the grounds that a proposed development could have an adverse impact on the Outstanding Universal Value of a World Heritage Site
- The new planning circular (07/2009)¹¹ supported by an English Heritage Guidance Note¹², is intended to improve protection of World Heritage Sites in the planning system. This emphasises the importance of Statements of Significance/ Statements of Outstanding Universal Value as the basis of effective identification, protection and management of World Heritage Sites and sets out the role of regional and local authorities in ensuring the protection, promotion and enhancement of World Heritage Sites, amongst other matters

¹⁰ http://www.opsi.gov.uk/si/si2008/pdf/uksi_20082362_en.pdf

¹¹ <http://www.communities.gov.uk/publications/planningandbuilding/circularworldheritage>

¹² <http://www.english-heritage.org.uk/server/show/nav.21142>

In Wales, current guidance in Planning Policy Wales¹³ states that local authority development plan policies should reflect the outstanding national and international importance of World Heritage Sites and should emphasise the need to protect sites and their settings. Sites are a material consideration to be taken into account by Local Authorities in determining planning applications and by the Assembly Government in determining cases on appeal or following call-in.

The Historic Environment Strategic Statement¹⁴ published by the Assembly Government's Minister for Heritage in September 2009 gave a commitment to the Assembly Government commencing work on draft planning guidance for the historic environment, including for World Heritage Sites, by the end of 2009. This is in train with a view to consultation on a revised chapter of Planning Policy Wales by summer 2010 to be followed by a draft of more detailed guidance later in the year.

In Scotland Scottish Planning Policy 23 (SPP23)¹⁵, on the historic environment requires planning authorities to protect World Heritage Sites and their settings from inappropriate development through development plans and decisions on planning applications. The Scottish Planning Policy series is currently being consolidated into a single SPP. The consolidated SPP will retain this requirement.

Scottish Ministers have also indicated that they intend to publish a World Heritage section of the Scottish Historic Environment Policy (SHEP) and Joint Working Agreements with planning authorities now provide a mechanism to ensure that Historic Scotland is able to advise on development within or around a site which is likely to impact on the Outstanding Universal Value.

Department of the Environment in Northern Ireland is currently the Planning Authority (though this function is proposed to devolve to new Local Authorities in 2012). The Giant's Causeway and Causeway Coast is currently the only World Heritage Site in the region and the Regional Development Strategy¹⁶ identifies the need to protect the site and its setting. Chapter 4.0 of Planning Policy Statement 6, Planning, Archaeology and the Built Environment¹⁷, provides policy on World Heritage Sites. Policy BH 5 states that; 'The Department will operate a presumption in favour of the preservation of World Heritage Sites. Development which would adversely affect such sites or the integrity of their settings will not be permitted unless there are exceptional circumstances'.

¹³<http://wales.gov.uk/topics/planning/policy/ppw2002/;jsessionid=WjXPLQ8L1psQnsx5dQ22gp1yT1GJyjBnr2kp98Q96ymzr1wcyGyj!-1738898946?lang=en>

¹⁴<http://wales.gov.uk/docs/drah/publications/090921strategicstatementheadlineactionplaneng.pdf>

¹⁵<http://www.scotland.gov.uk/Publications/2008/10/28135841/0>

¹⁶http://www.planningni.gov.uk/index/policy/dev_plans/devplans_az/northern_2016/northern_countryside/northern_countryside_causeway.htm

¹⁷http://www.planningni.gov.uk/index/policy/policy_publications/planning_statements/pps06-archaeology-built-heritage.pdf

The draft Northern Area Plan,¹⁸ in which the current World Heritage Site lies, was published in May 2005 but has been subject to two judicial challenges. It includes policies that provide for strict protection of the World Heritage Site and its Distinctive Landscape Setting confining development to essential facilities within the World Heritage Site and modest facilities necessary to meet visitor needs within the Distinctive Landscape Setting. It also curtails the extension or replacement of dwellings within the Distinctive Landscape Setting. Although the plan has not been finalised its proposals remain material considerations.

Local Authorities must be persuaded to take their responsibilities for World Heritage Sites seriously. The creation of the new Planning Policy Statement (PPS), to replace PPG15 and 16, should reflect the UK's responsibilities under the World Heritage Convention, and the enforcement of Article 1(5) Land.

Local Authorities in England, Scotland and Wales are in the front line as the planning authority and so have a key role to play in managing World Heritage Sites. They are required to have the appropriate policy and guidance in place to protect sites and to take full account of their significance in local development plans and policies.

Centralisation and consistency – in the planning system and between devolved Governments and central Government:

The current planning reforms proposed in England, detailed in the Review document, lead to very different degrees of statutory recognition across the UK's four administration. There should be a consistent approach to the protection and support given to all World Heritage Sites within the UK. The UK Heritage Protection Bill, the proposed Scottish Heritage Bill, and the consolidation of the Scottish Planning Policy series all provide opportunities to deliver stronger and more consistent protection for World Heritage.

The proposed England and Wales Heritage Protection Bill, and other measures across the UK, provide opportunities to deliver stronger protection for World Heritage, although they reflect different approaches across the UK's four administrations. While the approach to managing heritage is different in England, Scotland, Wales and Northern Ireland, it is designed to provide a sufficient level of protection to all UK World Heritage Sites. In terms of support: while each site is different and has its own needs, there is no single solution which could apply universally.

UK wide protection, support, research, guidance and funding in relation to climate change and World Heritage Sites should be developed and progressed.

UK wide protection, support, research, guidance and funding in relation to climate change and the historic environment is being developed and progressed, and is being shared across the UK, through the heritage agencies and bodies working together.

¹⁸http://www.planningni.gov.uk/index/news/news_devplans/news_devplans_northern2016.htm

Coordination between Government Ministries, departments and agencies, with regard to the protection of World Heritage Sites.

Government should work with Department for Communities and Local Government (DCLG) to clarify and consolidate recent initiatives emerging from planning reform and in particular address emerging Local Development Documents (LDDs), climate change, and renewable energy.

Government departments across the UK with an interest in World Heritage, and other cross-cutting issues, work together to clarify and consolidate recent initiatives emerging from planning reform and in particular address emerging LDDs, climate change, and renewable energy.

Government should ensure that where World Heritage Sites are known to be at risk, it works with local stakeholders to assess that risk and undertake appropriate remedial action.

The Government monitors the State of Conservation of all the UK World Heritage Sites, reports to UNESCO and ensures that appropriate measures are put in place in consultation with the Local Authorities and other stakeholders.

The Local Authorities

Local Authorities need better guidance and better resourcing. Although World Heritage Sites have protection within the planning system, through local and other plans, it is still profoundly unclear how their Outstanding Universal Value and attributes are taken into consideration when impact assessments are made, with the result that many Councils find it difficult to put into practice satisfactory systems for evaluating the impact of proposed development.

The management of a World Heritage Site can be challenging and complex but Local Authorities (or the equivalent authorities in Northern Ireland) should have clear guidance in place in their local planning framework. As the planning authority they are in the front line for managing change in relation to any site. We would encourage Local Authorities to employ the right level of expertise to take account of this responsibility. In addition, advice is also available from English Heritage or the Devolved Administrations where there is concern that a proposed development could have an impact on a World Heritage Site. The Government is working with site managers to develop clear Statements of Outstanding Universal Value for all UK World Heritage Sites as a basis for future management and protection.

Article 1(5) Land only provides very negligible additional protection to address cumulative impact. A large number of applications for Article 4 Land will be required to protect from other impacts such as those caused by microgeneration, and this will be costly for Local Authorities. This will have funding implications.

To prevent minor incremental change to World Heritage Sites in England, they have been included in Article 1(5) land in the Town and Country Planning (General Permitted

Development) Order 1995¹⁹. It is up to each Local Authority to decide whether they need Articles 4 and 7 (dealing with minerals matters) Directions in order to control permitted development.

World Heritage Site Coordinators should be afforded higher status within the Local Authorities than they currently have, and should be supported by well trained and experienced Conservation Officers.

The PwC study identified the World Heritage Site Coordinator as the best vehicle for managing most sites. It is essential that such a person should build strong links and understanding between all the parties with a role in running a site, especially with the relevant Local Authority (or in Northern Ireland, the local management group). However, it is for the Local Authority to determine the nature of such posts where they are the employer.

Local Authorities should have policies in their Local Development Documents which are specially designed to protect the Outstanding Universal Values for which their site is designated. Although protection will largely have to be addressed by Local Authorities there is little clarity on how the protection will be embedded in LDDs such as the Local Development Framework (LDF).

It is Government policy throughout the UK that Local Authorities should have policies in their Local Development Documents, or Development Plan which are specifically designed to protect the Outstanding Universal Value for which their site is designated. If Local Authorities require advice on how the protection might be embedded in the LDDs they should discuss with their regional English Heritage Office or the relevant Devolved Administration. Guidance is also available in the English Heritage Guidance Note.²⁰

Policies for the protection of World Heritage Sites should be introduced into Local Development Plan or Local Development Framework as soon as feasible following inscription.

The Government agrees. It is important that such policies and guidance should be in place in the Local Development Plan and other policy documentation as soon a site is being considered as a possible nomination for World Heritage inscription.

GUIDANCE

There was a large body of opinion that more guidance needs to be provided on the protection of sites and the requirements and responsibilities of the World Heritage Convention, tailored to

- **aspiring Sites**
- **site managers**
- **landowners and other local stakeholders**
- **Local Authorities and their planning departments.**

¹⁹ http://www.opsi.gov.uk/si/si2008/pdf/uksi_20082362_en.pdf

²⁰ <http://www.english-heritage.org.uk/server/show/nav.21142>

A variety of guidance is available from DCMS, Historic Scotland, Cadw or English Heritage and from the Advisory Bodies to the World Heritage Committee, ICOMOS, IUCN and the International Centre for the Study of the Preservation and Restoration of Cultural Property (ICCROM)²¹. In addition to a great deal of online, and paper based, technical guidance from UNESCO, Government works closely with Steering Groups and coordinators in developing nominations and on the management, protection and conservation of these sites following inscription.

Several respondents expressed the need for a high-level code of practice, for managers and planners, describing what World Heritage Site status means and how they should be managed in the UK.

The 'Operational Guidelines for the Implementation of the World Heritage Convention', on the UNESCO World Heritage website²², is the high level code of practice for the implementation of the World Heritage Convention. This set out the rules and for nominating, managing and other aspects of World Heritage Sites.

MANAGEMENT

Government

There was strong feeling that Government management structures could work better; that departmental and agency responsibilities should be clearly mapped and should all work more closely together on World Heritage issues, in support of local authorities with management roles for existing Sites.

DCMS acting as State Party to the World Heritage Convention works closely with the Devolved Administrations, other government departments including the FCO, Department for Communities and Local Government and the Ministry of Justice, as well as English Heritage and Local Authorities on World Heritage issues. Government also works closely with stakeholders at local, national and international level. It is important for all parties involved in managing World Heritage Sites to understand each other's role and to work closely together. These roles are set out in the management plan.

Management Mechanisms

DCMS should consider whether the management structures adopted by individual World Heritage Sites are strong enough, well understood by the parties involved, and well enough resourced to deal with the level of complexity of each site. DCMS should instigate a formal mandate to site managers and intervene if local arrangements fail to deliver the required results.

Ultimately Government as signatory to the Convention will have to be satisfied that proper arrangements are in place to manage our World Heritage Sites to meet the requirements of the Convention. Management arrangements are set out in management plans which have to

²¹ <http://www.iccrom.org/>

²² <http://whc.unesco.org/>

be submitted to UNESCO and which are evaluated for UNESCO by the World Heritage Advisory Bodies. Before Management Plans are sent to UNESCO, DCMS asks the relevant heritage body to confirm that they are fit for purpose. We work with other stakeholders such as developers and architects to help them to address concerns about individual sites so that they can be properly managed according to the commitments which follow from World Heritage status, and we look to them to play their part.

The Management Plan

There was widespread agreement that an effective, integrated management plan is of central importance, and should cover both the Outstanding Universal Value of the site, and social, environmental, economic and educational values and the responsibilities that pertain to them.

We agree that management plans underpin the understanding of the importance of a site, and are essential. They should set out how the values and benefits can be protected and promoted, allocating responsibility as appropriate. They should also identify the benefits the site can bring, such as improved conservation and the social, educational and economic benefits, and set out how these can be developed for local and other stakeholders and communities. They foster partnership among key partners. Management plans should be reviewed regularly.

The Stakeholders

There was widespread support for the involvement of a wide range of stakeholders, including owners, local residents and amenity societies, on the management of existing World Heritage Sites. Potential conflicts could be avoided by clearer guidance from DCMS.

An identified benefit of World Heritage status is the opportunity for a wide range of stakeholders to become involved in different aspects of managing a site, both to look after the site and promote the benefits it can offer. Roles and responsibilities should all be set out in the management plan.

Management Skills

Nationally led capacity building for World Heritage Site coordinators and Local Authority planners should be designed and implemented.

Historically advice and training for World Heritage Site coordinators has been provided by the International Council On Monuments and Sites UK (ICOMOS-UK), through regular meetings attended by DCMS, English Heritage and the Devolved Administrations. Local Authority planners with World Heritage Sites in their area are supported by advice from English Heritage, Historic Scotland and Cadw. In addition the sharing of experience and knowledge between coordinators of different sites is very valuable.

CONTROL

Permitted Development Rights

There was particular concern that further development of the railway must not be impeded, and Permitted Development Rights must be retained in all cases, and decisions with regard to performance and safety must remain with the stakeholder.

Major infrastructure developments can be a concern. There may be cases where it is more important to progress such development than to progress a nomination for a new World Heritage Site. If a potential site was subject to development which would be allowed because of Permitted Development which could adversely affect its Outstanding Universal Value, then it may not be appropriate for World Heritage Site listing.

Managing Change

Several respondents expressed concern at the possibility that World Heritage Site status would put Sites 'in aspic', impeding economic development, and others viewed change with concern.

Government believes that managing change is an essential part of conservation. Sites should continue to make a sustainable contribution to the community while maintaining the important qualities that underpin the World Heritage inscription. This can mean that some new development in the vicinity or some change to the site itself has to be considered. Where the proposal does not damage the Outstanding Universal Value of the World Heritage Site, and is of high quality then there should be no reason for it not to go ahead. Such development can give a site an economically viable future, or could for example, provide facilities to enable more people to access it. However inappropriate development, particularly in urban areas, can be a difficult issue for the future management of sites. Development proposals have to be considered very carefully, at a very early stage, in terms of their impact.

COOPERATION

Networking

There was almost universal support for the need for a better central network, in order to share experience of best practice, capacity development, communications, skills, international cooperation, etc.

Networking and cooperation between sites and stakeholders is a key benefit for the sustainable management of World Heritage Sites. Current arrangements through ICOMOS UK provide for coordinators to meet regularly with Government and its agencies to discuss all aspects of UK World Heritage Sites. We will consider how they can be made more effective. The Local Authorities World Heritage Forum (LAWHF)²³, the Local Government

²³ <http://www.lawhf.gov.uk/>

group, is another very valuable network. Site managers or coordinators are strongly encouraged to network both locally and nationally to share experience and best practice.

International Cooperation

Stronger international links were welcomed by some respondents.

We agree. UNESCO would like to see more international links between sites, such as through the development of Transnational or Transboundary World Heritage Sites, and the UK has taken an active role in working with other States Parties, through, for example, developing the Frontiers of the Roman Empire World Heritage Site. It is the role of DCMS as the State Party to take the lead in international links at Government level but there are a number of UK sites exchanging experience and best practice with site managers in other countries. The Organisation of World Heritage Cities²⁴ is an effective international organisation with a number of active member cities with World Heritage Sites in the UK.

Community Involvement

It was felt that there need to be stronger networks for sharing and learning, especially with regard to understanding significance and values in local communities.

It is absolutely right that stronger networks at various levels are necessary in order to maximise the benefits for the community of having a World Heritage Sites in their midst, and to help develop an understanding of the site. It is for local site managers, or coordinators, to take this forward as one of the clear benefits of World Heritage Site status.

FUNDING

Funding generally for the protection, management, and promotion of World Heritage Sites in the UK was felt to be poor. Many respondents felt that there should be an agreement that, if nomination of sites is to be slowed as suggested in DCMS' preferred Option iii, there should, in return, be improved funding for existing World Heritage Sites.

Funding from Central Government

There was very widespread support for a consistent, transparent, national system of funding and resource allocation for all World Heritage Sites, with core funding to finance a range of activities.

There is no direct core funding provided by DCMS as State Party for the conservation and management of the existing World Heritage Sites, though there are a number of other sources of funding. For example, since 1997 the Heritage Lottery Fund has provided more than £287 million for World Heritage projects, benefitting 20 out of the 28 UK sites. Government also provides considerable advice and support to site managers, and for the nomination process, through English Heritage and the Devolved Administrations. Some

²⁴ <http://www.ovpm.org/?newlang=eng>

grant aid for conservation work is also available from these sources, subject to meeting criteria and priorities and depending on budgets.

Sites should explore ways of working together to share resources and to explore different sources of funding such as sponsorship and setting up friends' organisations and other ways of generating income. The PwC study showed that World Heritage Sites can generate economic benefits and these should be actively explored.

Some respondents felt that the responsibilities bearing on Local Authorities in relation to managing World Heritage Sites should be recognised by Government through grant-in-aid.

Local Authorities are key stakeholders in promoting nominations for World Heritage Sites and should understand the costs and benefits involved. Funding specifically for World Heritage Sites is not provided as a direct grant for Local Authorities throughout the UK nor is it ring fenced within a single allocation, so local funding decisions are made on the basis of need and priority. Funding may be available from other stakeholders, and through promoting a range of social and economic benefits to the community. Local Authorities in England are encouraged to discuss possible support with their Regional Development Agency.

The Overseas Territories and Crown Dependencies

Overseas Territories and Crown Dependencies are a special case, with natural Sites in the Overseas Territories urgently requiring increased funding for their management because of problems of invasive alien species. Overseas Territories Administrations such as Tristan de Cunha and Pitcairn Island do not have the budgets to deal with these problems. Without these resources, it was felt that there is the real possibility that Sites will be eligible for listing on the World Heritage in Danger List.

We are working with the relevant authorities to address the issue of invasive species. The UK currently has 2 natural World Heritage Sites in the Overseas Territories and, although the main responsibility for management lies with the authorities responsible for Henderson Island and Gough and Inaccessible Islands, some support is provided.

PROMOTION

Awareness Raising

The promotion of World Heritage status should be a formal duty, resulting from inscription.

It is for World Heritage Sites to decide on their own marketing strategies, individually or as a critical mass, or through the Local Authorities World Heritage Forum, in the light of resources they are able to devote to promotion. If they agree on a national approach, closer working with VisitBritain and, in England, through the Regional Development Agencies can be helpful.

Promotion of the understanding of the site and its Outstanding Universal Value should be set out in the Management Plan, including the roles of all the stakeholders in this area, in order for the site to reap the social, educational and economic benefits for the local and wider community.

Action by Central Government

As with issues of protection, management and funding, it was felt that DCMS should have a programme to promote and publicise UK Sites, and support the Local Authorities in promoting the value of World Heritage Sites.

It is for local site managers and Local Authorities to work together through the LAWHF or other groups to promote all the range of benefits that can be found with World Heritage status, both for individual or groups of sites and for all the UK sites together. For example, four World Heritage Sites in the UK have recently produced an interactive map which will benefit anyone interested in any or all of these sites. Many sites also have education programmes aimed at different age groups. There is much that can be done in this respect and we would encourage coordinators to work creatively with their colleagues.

The Website

The concept of a “one stop shop” website to access best practice on heritage management was extremely popular, but it was noted that it needs to be more prominently accessible than is currently the case.

The DCMS World Heritage Portal provides access to a wide range of other sites and information providers, as does the UNESCO website. The Devolved Administrations, and English Heritage, also feature World Heritage on their websites. We would encourage a wide use of these websites.

Promotion through Education

The great potential of education through World Heritage and through individual Sites should be grasped.

There is a special relevance for World Heritage Sites as a resource for educational purposes for all age groups. World Heritage Sites can be a means of highlighting an awareness of heritage, leading to reflection on identity, appreciation of diversity and, in turn, to increased respect for our own and other countries' cultures and care for heritage. World Heritage provides a window into shared experience of heritage conservation and management globally. These are issues of international significance given world-wide pressures from climate-change, population growth and mobility, food and energy security. There is potential for contributing to cross-curricular and interdisciplinary initiatives within formal education, and to intergenerational, family focused learning. *'Making Sense off our World Heritage Sites'* is a nationwide initiative that aims to help the UK's World Heritage Sites make a contribution to the national curriculum's aim of helping children and young people explore identity, diversity and global citizenship. A conference to examine ways of taking this forward was held in 2009 at the 'Jurassic Coast' World Heritage Site with the support of DCMS and the UK National Commission for UNESCO.

LIST OF ORGANISATIONS RESPONDING TO CONSULTATION

Allerdale Borough Council
Archaeology Forum, The
Architectural Heritage Society of Scotland
Association for Industrial Archaeology
Association of Consultant Architects
Avebury Society, The
Avebury World Heritage Site
Bath Preservation Trust
Birmingham City Council
Black Country Consortium Ltd, The
Blenheim Palace World Heritage Site
Brompton Conservation Association, The
Business in Sport and Leisure
Cairngorns National Park Authority
Campaign to Protect Rural England, The
Chagos Conservation Trust
Chatham World Heritage Steering Group
Cheshire West and Chester Shadow Authority
Chester Civic Trust Publicity Committee
City of London (City Corporation)
City of Westminster Council
Co-ordinator, Bath WHS
Cornwall World Heritage Site
Council for British Archaeology
Country Land and Business Association
Cresswell Heritage Trust
Culture Cumbria
Cumbria Association of Local Councils
Cumbria County Council
Defence Estates
Derwent Valley Mills World Heritage Site
Devon County Council
Dorset and East Devon World Heritage Site
Durham World Heritage Site
English Heritage
Falkirk Council
Forestry Commission for England
Fort Amherst Heritage Trust
Friends of the Lake District
GeoConservation Commission

Glamorgan-Gwent Archaeological Trust, Ltd
Glasgow City Council
Greater London Authority
Greenwich World Heritage Site
Heritage Lottery Fund
Historic Dockyard, Chatham, The
Historic Royal Palaces
ICOMOS-UK
Institute for Archaeologists
Institute of Historic Building Conservation
International Consulting Agency
Ironbridge Gorge Museum Trust
Isle of Man Government
Joint Nature Conservation Committee
Lake District National Park Authority
Lake District World Heritage Project
Liverpool World Heritage Site
Local Authority World Heritage Forum
Medway Cultural Partnership
Merseyside Civic Society
Ministry of Defence
Museum of London, Docklands
National Trust for Scotland, The
National Trust, The
Natural England
Natural History Museum, The
Network Rail
Niace
Northwest Regional Development Agency
Northwest Regional Development Agency
Peatlands Partnership, The
Port Sunlight Village Trust
Portsmouth City Council
Portsmouth Naval Base
Portsmouth Society, The
Royal Commission on the Ancient and Historical Monuments of Wales
Royal School of Military Engineering, Chatham
Royal Society for the Protection of Birds
Royal Town Planning Institute
Ruskin Foundation, The
Scottish Civic Trust
Scottish Natural Heritage
Society of Antiquaries
Society of Antiquaries
Somerset County Council

South Lakes Development Agency
South Lakes Development Trust
Stratford-On-Avon District Council
Tourism Company, The
Tourism South East
Tyne and Wear Museums
UK National Commission for UNESCO
UK Overseas Territories Conservation Forum
Wiltshire Archaeological and Natural History Society
Wiltshire County Council
Wordsworth Trust, The
World Heritage for York Steering Group