

Centre for Applied Archaeology

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**World Heritage for the Nation: Identifying, Protecting and
Promoting our World Heritage**

Analysis of responses to the policy review

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PART 1 INTRODUCTION (Section 1)

1: BASIS AND METHODOLOGY OF THE REPORT

1. 1 THE CONSULTATION

The consultation paper for the World Heritage for the Nation: Identifying, Protecting and Promoting our World Heritage review ¹ was published by the Department of Culture, Media and Sport (DCMS) on December 2nd 2008. The deadline for responses was February 25th 2009, and 117 responses were received by the end of this twelve week period.

1.2 TERMS OF REFERENCE FOR THE REVIEW

The Review had the following terms of reference:

- *To explore the extent to which the UK's current approach to World Heritage supports the interests of the UK Government and those of the Governments of the Crown Dependencies and Overseas Territories in protecting and promoting their cultural and natural heritage; their wider strategic priorities; and their international goals, particularly in relation to UNESCO.*
- *To examine the costs and benefits, rights and responsibilities of World Heritage Site status, the balance currently achieved between them, and the implications for the future management, promotion and funding of such sites.*
- *To consider what measures might be taken to clarify and/or strengthen protection for World Heritage Sites.*
- *To recommend a policy on making future nominations for World Heritage Site status.*

(DCMS 2008 World Heritage for the Nation, p5)

¹ http://www.culture.gov.uk/images/publications/whconsultation_engversion.pdf

1.3 METHODOLOGY

Structure and content

The report is divided into 4 Parts:

- Part 1 is an introduction to the Review, and to the methodology of this analysis of the results.**

 - Part 2 contains material extracted from responses to the Review. This is arranged thematically, in Sections 2-9**
- Data taken from responses has been structured using the same headings as those in the original consultation paper. In addition, Section 9 provides an analysis of and comments on the Review document itself, also taken from the responses to the Review.**
- Part 3 provides an analysis of the responses**

 - Part 4 contains Appendices in the form of the tabulated information: this is the material from which Part 2 is drawn.**

Data protection

In the interests of data protection, information that could identify the respondent has been removed. In the tables in the Appendices, respondents are therefore identified by the numbers assigned to them by DCMS.

Numbering

It should be noted that one response was duplicated in the original numbering system (entries 48 and 75 in the tables shown in the appendices relate to the same response.

Abbreviations

The following abbreviations have been used:

OUV: Outstanding Universal Value

TL: Tentative List

WH: World Heritage

WHS: World Heritage Site

LAWHF: Local Authority World Heritage Forum

OT: Overseas Territory

CD: Crown Dependency

PART 2: ANALYSIS OF RESPONSES (Sections 2-9)

2: WORLD HERITAGE SITES – CURRENT POSITION

2.1 WHAT ARE WORLD HERITAGE SITES? WHICH SITES ARE ELIGIBLE?

There was general understanding of and support for WHSs as vehicles for the conservation and promotion of the Nation's heritage assets.

Many respondents agreed with the Review's suggestion that there needs to be greater awareness-raising and networking, not only with regard to the management of sites, but also to support the bid development stages, in order that there is absolutely clear understanding as to which sites will be acceptable. One respondent requested that the UNESCO criteria and an explanation of Statements of Significance be rendered in "clear and limpid prose".

2.2 WHERE ARE OUR SITES?

The PricewaterhouseCoopers (PwC) report, *The costs and benefits of World Heritage status in the UK* included for consideration in the review documentation records the fact that, when consulting with key stakeholders, many were unaware of the composition of the current UK WH List and expressed surprise at the selection of Sites, the implication being that they did not wholly approve the choice.

Particular concerns about the current List raised by the Review were:

- an imbalance between natural and cultural WH Sites in the UK
- the "reactive and subjective nature of the WH List of cultural Sites, in that it is conditioned by policies and perceptions of the moment, rather than by one overarching view". This was contrasted to the approach to natural Sites (i.e. IUCN lists)
- under-representation of the UK in relation to continental Europe, as the UK ranks fifth among the five countries cited in the Review
- inconsistency in the addition of new Sites to the List by not nominating Sites annually since 2001: it was felt that the UK has taken a more literal approach to the UNESCO Global Strategy than other State Parties. Some of these are felt to have (successfully) focused on OUV, authenticity and integrity, and the preparation of a robust management plan, to justify nomination of Sites which do not accord with the Global Strategy. It was suggested that the UNESCO Global Strategy is a factor, but may not be the sine qua non that was represented in the 1999 UK TL and is set out in this Review
- a paucity of living cultures, especially traditional cultures
- the need to consider immobile historic ships as built heritage

2.3 HOW WERE OUR SITES IDENTIFIED? WHICH SITES REMAIN ON OUR TENTATIVE LIST?

Although several respondents commended the quality of the work put into researching and choosing Sites for the 1999 TL, it was agreed by many that UNESCO priorities have moved on, and that the UK's priorities need to be updated accordingly.

There was some concern that the considerable work and expertise put into selecting the 1999 Tentative List was being nullified by the suggestion that Sites on that List may now have to reapply, and do so on an equal footing with new Sites.

The sites which remain on the 1999 Tentative List are:

- Chatham Naval Dockyard
- Darwin's Home and Workplace: Down House and Environs
- The Lake District
- Manchester, and Salford (Ancoats Castlefield and Worsley)
- Monkwearmouth and Jarrow Monastic Sites
- The New Forest
- Great Western Railway (selected parts)
- Shakespeare's Stratford
- The Wash and North Norfolk Coast
- The Cairngorm Mountains
- The Flow Country
- The Forth Rail Bridge
- Mount Stewart Gardens
- Fountains Cavern, Anguilla
- The Fortress of Gibraltar

2.4 HOW DO WE LOOK AFTER OUR WORLD HERITAGE SITES?

2.4.1 Protection

There was considerable concern about the perceived inadequacies of the current system of protection for WHSs in the UK. The primary concerns were that:

- the present framework for planning protection for WHSs, supported by Management Plans, is not strong enough, despite ultimately strong precedents in earlier years: the current use of Conservation Area status, for instance, has proved too weak and too narrow to reflect the international status of WH Sites adequately.

- WHSs do not currently receive sufficient protection for their context and setting, particularly in relation to views from the Site, and that benefits of WH status are undermined by the lack of protection in the planning system e.g. Buffer Zones may be given limited or no consideration in the planning process.

2.4.2 Management

Several respondents noted that the WH Convention and the Operational Guidelines clearly place the principal responsibility for managing WHSs on the State Party.

It was noted however that

- management of WHSs varies greatly in quality throughout the UK, through the variability of resources and skills.

- weakness in presentation and general awareness of WH issues in the UK is a matter of concern.

- implementation of management and presentation is generally devolved to individual Sites and their local authorities.

- there is a lack of full understanding by planners and managers of what is required by the WH Convention.

- there are issues with regards to the dominance of some managers/ stakeholders at some WHSs, whether through land ownership or commercial/ financial interest.

2.4.3 Funding

The point was made by many respondents that although responsibility for WHSs lies with the government of the State Party:

- the limited resources that are available from central government are spread very thinly among existing Sites.
- resources available to Local Authorities have often not been increased to meet their new responsibilities.

With regard to other sources of funding, comments were made that:

- decisions on the distribution of funding by the State Party via a variety of agencies to assist in managing the WHSs are often localized and discretionary.
- funding for Sites is unreliable, and that even when agreed in principle, it can be withdrawn suddenly: it was pointed out that this had happened with much of the capital investment in the Jurassic Coast Framework.
- the OUV of a WHS does not seem to make it a priority candidate for national or European funding.

Implications of the current funding situation are felt to be that:

- although WH status is potentially one of the most powerful instruments in favour of appropriate conservation areas and their necessary enforcement systems, as things stand, political backing and funding appear to be inadequate.
- 7 WHSs are already recognised by UNESCO as raising serious concerns, and 2 risk being placed on the Sites in Danger list.

2.4.4 Promotion and education

It is accepted by many respondents that the WH “brand” needs to be better known, and its significance appreciated.

It was pointed out that the fact that the National Curriculum does not specifically include WHSs means that individual Sites must tailor their education programmes to fit in with the Curriculum. This sometimes means downplaying what it is that makes a Site outstandingly valuable, and highlighting ways in which it fits into a specific module.

2.5. POLICY FOR MAINLAND UK WORLD HERITAGE

The following problems were noted with regard to current WH policy in the UK:

- the lack of an overall strategy in the UK for meeting the obligations of the WH Convention;
- a lack of commitment to UNESCO by the UK Government: low levels of public interest and commitment were felt in part to reflect the lack of enthusiastic endorsement of the concept of World Heritage by the Government;
- confusion with regard to Government relationships with UNESCO; the role of ICOMOS (nationally and internationally) and the responsibilities of the home country statutory conservation bodies;
- the lack of any additional funding or explicit contractual relationship between the Government, and the organisations to whom responsibility for WHSs is devolved;
- the lack of any structure to unite or unify the UK's WHSs nationally;
- the risk of setting unfortunate precedents: an example given was that the Mayor of Lyon has cited the City of London as his model for a proposed cluster of towers within close proximity of the historic core of his city.

2.6 POLICY FOR WORLD HERITAGE IN THE UK OVERSEAS TERRITORIES (OTs) and CROWN DEPENDENCIES (CDs)

The Review has highlighted the fact that policy issues for the OTs and CDs are rather different to those for mainland UK Sites.

It is felt that:

- WH status has particular importance to the OTs/CDs, which are easily overlooked, both in the UK and internationally.
- the natural and cultural heritage of the OTs is often very distinctive from, located far away from, and (particularly in the case of biodiversity) of greater international importance than that of the 'domestic' UK. The arrangement by which potential WHSs in the OTs and CDs are nominated under the UK Tentative List is in some respects seen as problematic, as it may not fully take into account the different context that applies in these territories, in particular with regard to protection regimes.
- the concept of managing UKOT sites as if they were WHSs has been advanced, and even enshrined in relevant documents, for South Georgia and Chagos archipelago.

However,

- of the over £268 million allocated to WHSs since 1994, none has been allocated to Sites on the UKOTs

- it was felt that DCMS is spending very little on Sites on the OTs because it believes that they are the responsibility of the Foreign and Commonwealth Office. The FCO, however, has little biodiversity expertise and few resources to support conservation work

3. WORLD HERITAGE COMMITTEE POSITION ON FUTURE NOMINATIONS

3.1 COMMENTS ON WORLD HERITAGE COMMITTEE POLICY

Many respondents acknowledged the need to create a balanced, representative and credible list, and saw the Global Strategy as being useful.

- The thematic approach identified by UNESCO and its advisors has identified gaps in the coverage of WHS which should be filled if the Convention is to meet its objectives.
- Many themes for cultural heritage in the UNESCO Global Strategy are relevant to the UK and need to be seen in the context of UK heritage.
- Agree that there is over-representation of cultural sites in Europe (particularly associated with Christianity, historical periods, and elitist architecture), and also that natural sites should have priority.
- IUCN has identified the need to develop the geological and geomorphological themes of the WH series.

Several commented that they felt that the List was now too large, and that this ran the risk of devaluing the “brand”. Many also agreed with the WHC’s position that well-represented countries (including the UK) should slow down nominations, with a few reservations:

- It is ‘understandable and desirable that UNESCO should seek to achieve a more even distribution of Sites across the world. This implies a switch of priority from the built heritage to landscape, but this change of policy should not be allowed to exclude recognition of the rich heritage of countries like the UK, including their maritime and underwater heritage’.
- Extremely concerned that ‘highly eligible cultural sites are being side-lined and in danger of being omitted from both the UK and UNESCO lists. This would result in serious omissions on the UNESCO list’.
- Concern about domination of European sites overlooks ‘the globally interrelated nature of such Sites’.. e.g. “Hidden Histories” have unearthed ‘a rich stream of global cultural links from even apparently Eurocentric collections. Such links provide a catalyst for future international partnerships at a civic and international level’.

Others disagreed strongly with the possibility of devaluing WH by increasing inscription, arguing that as long as a Site is truly of outstanding value to humanity, it cannot devalue the List.

One respondent pointed out, however, that conversely, just because a Site has OUV, it should not automatically be put forward for inscription.

- Agree with the Global Strategy report *Railways as World Heritage Sites* that “not all railways worthy of World Heritage status need to be designated in their own right. Railways have always been built as a means to some other end...”

3.2 UNDERSTANDING OF WORLD HERITAGE POLICY

It was pointed out that the 1972 UNESCO Convention constitutes a commitment to the protection and conservation of cultural and natural heritage at all levels, not only WHSs.

- As such, focus on the WH List is not necessarily helpful: it tends to obscure the wider responsibilities that attach to State Parties.

There was some concern that the Convention is not always well understood. Several respondents felt it necessary to point out that the role of the Convention is to identify and protect sites that are of global significance for their cultural and natural heritage value, rather than to promote tourism and regeneration.

There was concern that OUV is being misunderstood to mean national significance.

One respondent commented that some sites consider Criterion (vi) to be sufficient to justify nomination, despite advice from UNESCO to use this in conjunction with other criteria.

And, there were some obvious misunderstandings of WH policy within the responses themselves:

- The purpose of the 1972 Convention was not always understood: i.e. that this was also intended to protect sites, and not only to recognise Outstanding Universal Value.

- There was a lack of understanding about the reasons behind the paucity of UK natural sites.

- There was concern that there appear to be no procedures for cancellation of designation in the future if circumstances change.

4. COSTS AND BENEFITS OF WORLD HERITAGE STATUS

4.1 THE RESEARCH

PricewaterhouseCoopers LLP (PwC) was commissioned in 2007 by DCMS, Cadw and Historic Scotland to investigate the costs and benefits of World Heritage Site status in the UK, in order to support DCMS' wider review of World Heritage policy. The resulting report, *The costs and benefits of World Heritage status in the UK* (2008) was intended as background material on which respondents could comment: no subsequent action was to come out of the report itself.

Questions to be addressed were:

1. What are the costs and benefits associated with WHS status and who incurs or gains them?
2. How are these costs and benefits affected by the specific characteristics of sites?
3. How are the costs and benefits perceived and how prepared are sites for them?
4. How can these costs and benefits be optimised in the future?
5. How is this situation likely to change in the future and what else needs to be considered?

Case studies chosen for the research:

The New and Old Towns of Edinburgh
The Tower of London
The Castles and Town Walls of King Edward I of Gwynedd
Studley Park Royal and Fountains Abbey
Blaenavon Industrial Landscape
The Dorset and East Devon 'Jurassic' Coast

The following surveys were carried out:

- 'Strategic' consultations with key stakeholders from DCMS, Local and Devolved government, Heritage groups, Tourism sector representatives, developers and others
- An electronic pro-forma with questions about costs was sent to 24 sites in the UK which had WH Status (this number excluded the three WH Sites in UK Overseas Territories)
- 10,403 postal surveys were distributed and a total of 1,660 returns were received: a response rate of 16%

4.2 RESPONSES TO THE PwC REPORT: COSTS AND BENEFITS

55 of the 117 respondents to the Review commented directly on the PwC report.

There was generally a high degree of agreement with the findings of the research that:

- recognition on the WH List does not necessarily lead to increased tourism and benefit to the local economy, and that**
- no firm conclusions can be reached regarding the benefits of joining the WH List**

A sample of comments follows:

- Preparation of nominations consumes many resources and skills which could otherwise be devoted to the better management of existing WHSs.**
-sceptical about the value of WHSs i.e. whether they bring enough real benefit to justify cost.**
- Increased interest in pursuing WHS status as a tool for regeneration is not always met by equal enthusiasm or recognition by regional and national development agencies that WHSs can be a major asset and a catalyst for urban regeneration. This severely limits the regeneration potential of WHSs, sometimes leading to community resentment and stakeholder disillusionment.**

However, there was also strong support for the opposite view, expressed in some detail, and coming notably from both TL sites actively preparing bids, and inscribed WHSs. These claim that as yet, there is in fact not sufficient evidence to support the conclusion that WHS inscription has negligible or no benefits to the wider economy, and that there is some evidence to the contrary.

There were particularly positive responses about benefits accruing from the bid process itself, from Chatham and the Lake District (i.e. increased funding because of the prospect of WH nomination). This might be expected from sites aiming for nomination, but the Jurassic Coast and Cresswell Crags both confirmed that there had been considerable benign results from the bid process in the form of improved infrastructure, and in the case of the Jurassic Coast and Derwent Valley Mills, from inscription, which had brought levered-in grant funding.

Other such comments were:

- Blaenavon Industrial Landscape 'has shown a marked improvement in indicators of economic performance'. 23's research has demonstrated a link between investment in the heritage and**

economic improvement. 23 remains ... 'committed to the benefits of heritage-led regeneration'.

- **Benefits include the potential for gaining additional funding, and promotional advantage.**
- **Whatever the outcome of any nomination bid, the process itself will have generated support and momentum that will have real lasting benefit.**

In all of these cases, there were also claimed to be less tangible, social and cultural benefits, which can themselves lead to economic improvement:

- **The bid has had an effect in re-establishing local pride and identity, integrating arriving communities and generating community initiatives, and providing a method of communication.**
- **The bid has given the community the opportunity to visit venues in the WHS which they may not have been aware of or previously visited.**
- **WH status has a value in creating a powerful identity for places and communities, which in turn creates the conditions for social and economic success: in practice this does not always happen, though Liverpool has been an example of success.**

The Overseas Territories and Crown Dependencies were not included in the PwC research, but also concurred that inscription had potential benefits, resulting from better protection:

- **Despite their exclusion from a number of studies assessing costs and benefits of UK WHS status, there is evidence that Sites in the UKOTs/CDs have benefited from this status, largely because protection systems were less effective than in the UK.**

There was very considerable support for the suggestion that there should be core funding made available for a full-time WHS Coordinator at every Site.

4.3 RESPONSES TO THE PwC REPORT: DESIGN, SCOPE AND EMPHASIS

There was however great concern about the wider design, scope and emphasis of the PwC report.

4.3.1 Design

There was concern that the WHSs chosen for the study were not fully representative of the UK, and some felt that the study was in itself inappropriate:

- Of the six case studies, four were established WHSs with a recognised brand and for which little base-line evidence exists prior to inscription. This made it difficult if not impossible to measure the economic impact of WHS inscription.
- The complexity, variety, scope and most importantly the *raison d'être* of WH Sites does not lend itself to this type of study, which contained errors, and failed to celebrate the extremely positive nature of work undertaken at many UK WH Sites.
- A cost benefit analysis of WH Sites and their nomination process such as that carried out by PwC LLP is not appropriate: if the UK has sites of outstanding universal value, internationally recognised as significant and worth inscribing as of WH status, they should be adequately protected for future generations.

One respondent felt that it was too early to be able to judge economic benefit:

- Given the intentional and inherent diversity of WHSs, a precise understanding of the costs and benefits of a nomination can only be agreed at site level and must reflect both local and regional circumstance, and public and stakeholder commitment. It is only very recently that sites have had to consider financial and social benefit: it is too early to judge the impact for many sites at this stage.

4.3.2 Scope

Comments were as follows:

Other pieces of research in the value of heritage assets have been undertaken (including some very recent research by the Historic Environment Advisory Council of Scotland, which is still to be published). It would have been more helpful to have included references to this wider analysis as the PwC works seems a bit narrow in its scope.

(NB Other research was in fact quoted in the Full Report.)

- Weak on benefits, which are assessed almost solely in economic terms, and does not recognise that WHS status is primarily of cultural benefit to the international community as a whole.

4.3.3 Emphasis

The PwC research was felt by many to be wrongly constructed, placing too much stress on economic costs and benefits at the expense of wider benefits.

There is grave concern at what is seen as the direct linkage implied in the report between inscription and the ability to prove future economic gain, creating a confusion as to what the criteria for inscription are:

... future Sites interested in pursuing World Heritage Site Status should first consider whether they can ensure that basic funding for coordination costs is secured. (PwC 2008, 7.20)

Many respondents stressed the importance of OUV as the prime (if not the only) criterion for inscription, which they felt that the report sidelined:

- Whilst the beneficial relationship between heritage and economy is well-established, it is not of concern to a WHS bid and in no way contributes to a justification of OUV.

- The report may have...given insufficient weight to the fact that the purpose of the WH Convention is to celebrate and conserve heritage of importance to all humanity. The Convention is primarily an instrument of conservation, not regeneration.

- Emphasis on the costs and benefits of Sites rather than the importance of their listing for OUV severely detracts from the purpose of listing. This should not be the primary concern or reason when considering whether to pursue WH status for a particular Site.

- A cost/benefit review seemed an opportunity to offer practical guidance. However, the Society deplores its negativity with its emphasis on the financial costs of the nomination and subsequent management of WHSs.

And, more poetically:

- Of greater concern should be the cultural and historical importance of these sites. The soul of a nation lies in its past and its heritage, not in its purse.

This is felt to have led to new problems for the management of Sites:

- It is difficult to move discussion of WHS value in the political and media arenas away from expecting, promoting and seeking to realise tourism and public benefit.

- There is a current trend to view WHS designations as a key to unlocking funding and as a tool for regeneration rather than one for protection and conservation.

There was concern from several respondents that the report failed sufficiently to make the connection between WH status, and the achievement of wider Government aims:

- WHSs have a considerable and demonstrable track record of delivering substantial softer benefits, related to community, sense of place, sense of identity, etc. Optimising these benefits – across all aspects – should be given a high priority, as this would allow WHSs to be seen as part of sustainable development in the widest sense of those words.

- the Impact Assessment of the Draft Heritage Protection Bill states: 'The main benefits... are non-monetisable, and may be best expressed in terms of public value and sustainability'. This approach does not seem to have been followed through in connection with WHSs.

- ... seeks to see benefits primarily in the short term and in socio-economic terms. Whilst these are important, the report fails to fully recognise the long-term intrinsic benefits of conserving our cultural and natural heritage, in maintaining a diverse and locally distinctive environment and in supporting sustainability.

It should be noted however that the report states that:

An increasing local and regional focus on culture and heritage as a tool for regeneration has created an atmosphere where WHS status is more likely to be supported for economic and social reasons that are not directly linked to its primary conservation objective. This hypothesis is also supported by the types of site currently coming forward and by the increasing involvement of RDAs in the nomination process. There is also a growing risk that WHS status will in the future be used increasingly for attaining those economic and social goals which may be only loosely linked to conservation benefits. This will affect the motivations and the achievement of benefits. (PwC 2008, 45)

... making the salutary observation that the previous TL had perhaps already set the tone of regeneration through WHS status which many respondents are ascribing to this Review, and the PwC report in particular. The report does not specify which sites it means, but would perhaps be referring particularly to sites such as Blaenavon, Derwent Valley Mills, New Lanark and Saltaire, which had lost their original industrial function.

4.4 USEFULNESS OF THE REPORT

Several respondents found the report useful:

- Findings of the report should be incorporated into good practice guidance. This should firstly be circulated to all heritage officers, including those responsible for relevant planning controls, for their observations.

However, although many agreed with some of its findings, and saw it as a useful first step, most had reservations. There is considerable comment about omissions, lack of clarity and unreliability of the figures, which in part reflect the complexity of a task which needed to take into account intangible as well as tangible benefits, and a very wide diversity of Sites.

- ...over complicated, incomplete and sometimes impenetrable.
- The report is a flawed document that confuses rather than contributes to our understanding of the benefits or otherwise of WHSs and their status.

4.4.1 Costs

Several respondents found that costs were not expressed clearly:

- Costs of bidding for WHS status are shown gross, but the benefits rarely quantified.
- It is not clear from the summary how much costs are over and above the costs borne by the stakeholders of the Site had it not been inscribed on the WH List.

4.4.2 Benefits

As with Costs, several respondents were unsatisfied with the way in which Benefits were calculated:

- Benefits are not calculated financially, and are presented as an abstract concept with no monetary figure attached, so that a direct comparison of benefit against cost is difficult or impossible.
- Benefits are dependent on how much effort is put in; on sites and their contexts; on the amount of time a Site has had to accrue them and thus Sites are not comparable.
- Methodologies for the measurement in financial terms of factors such as quality of life, awareness, recognition and pride are insufficiently robust and arguably irrelevant.

4.4.3 Omissions

The report was felt to be less than comprehensive about either the costs or the benefits of inscription. Omissions noted were as follows:

- Directly recoverable costs are not mentioned;
- Specialist advice and expertise available from partner organisations should be identified and included;
- Comparison is only made between UK WHSs, not also with UK properties of parallel characteristics and comparable management and promotional structures that are not on the List (and for which the management and promotional structures are generally in-house within Local Authorities and absorbed into their overall budgets);
- No comparison is made with WHSs outside the UK;
- Important resourcing issues (i.e. omitted from the report) include the current ineligibility of UKOTs/CDs for Heritage Lottery Funding. Confusion in lottery bodies between UKOTs/CDs (which are UK territory) and Commonwealth countries (which are not) should have been recognised;
- No reference is made to similar analyses made on behalf of the UNESCO WH Centre;
- There are further notable omissions from the literature review with regard to WH policy and management guidelines;
- More work is needed to understand the economic impact of the WHS brand as a justification for inward investment in visitor infrastructure;
- Greater account should be taken of archaeological, historic, natural history, landscape or cultural value;
- Survey work should be carried out with local/national learning providers to qualify and quantify the statement that "WH status is considered to be a tool for learning engagement..... there seems to be a degree of learning and cognitive growth at the Sites" (Section 4.6) .

A respondent from one WHS which was used as a case study points out very large discrepancies between figures for management costs and implementation costs cited in the report, and facts on the ground, and provides considerable detail with regard to benefits of WHS status, encompassing values, buy-in, planning, and levered-in grant funding.

4.5 VERSIONS OF THE REPORT

It is apparent from some responses (and from the lack of others) that very few respondents read the full PwC report. It should be noted that there were three versions: the full report; the executive summary within the full report, and the yet further summarised version in the Review document "World Heritage for the Nation". It is likely, given that the respondents are likely to be busy people and pressed for time, that most only read the shortest version. This inevitably meant that some significant findings were missed.

For example, local residents were asked:

'To what extent do you agree - I don't believe that there is currently a good balance between conservation of the site and having tourists or new developments in the area' (PwC Full report 2008, p. 54)

Between 17.8 and 41.6 % either agreed or strongly agreed that this was the case, a high level of concern which could either be turned to advantage by the site management, or turn against them if ignored.

Given that most of the respondents to the survey were heritage and/or conservation institutions, and that there was a high level of criticism of the report for being too financially oriented, it is surprising that this was not picked up. These figures however were not in the Summary.

4.6 RESULTS OF THE REPORT

It is possible that the PwC report has, rather than clarifying the issue of costs and benefit, consolidated a growing perception commented on by many respondents that inscription is now dependent on a Site being financially viable:

- We welcome the review of costs and benefits of WHS status in the UK. The Review has clearly identified where the most benefit and value for money can be achieved.

This response then goes on to base a proposal of the Somerset Levels and Moors as a WHS on the fact that they would be a "cost-effective" candidate, with no mention of OUV.

- If potential sites should first consider whether they can ensure that basic funding for coordination costs is secured, this needs to be included in the questions and be made visible as a key criteria to be considered before completing a Stage 1 application.

- WH status must not significantly hinder development when the wider economic benefits outweigh the benefit of WH status.

The Review document may therefore be misleading candidates as to UNESCO's priorities. See the response below:

- Applicants should be asked to show that designation would be likely to produce substantive net public benefits, based on the experience of already inscribed WHSs as set out in the findings of the PwC study (so that sites which, for instance, are already very well known, or are likely to have high management costs, may be less likely to pass Stage 1) There is little point in considering sites in detail, let alone nominating them unless some real public benefit would result from inscription.

Respondents above are using the Review to justify the idea of Sites being inscribed in order to benefit local economies, rather than as a tool to see whether sites should consider starting the inscription cost at all. The idea of protection, or recognition of OUV, is ignored: indeed, a site that is "already very well known" is disregarded as a possible candidate if it will not benefit financially.

Many respondents however point out that OUV is an absolute; to bring funding into the equation is an irrelevance at the TL Review stage, and that funding is the responsibility of Government from the time of inscription, given that it is a signatory of the WH Convention.

4.7 REASONS FOR CONFUSION?

The full PwC report is quoted as saying that:

Aspiring sites should consider what it is that they hope to gain from WHS status and in particular whether these aspirations link clearly with the World Heritage Convention. If these objectives relate to conservation, education, understanding or social objectives then they may represent a good fit. If these objectives relate to regeneration, economic or tourism objectives then these are not strongly related to World Heritage and indeed there may be more attractive ways of achieving these benefits.

(PwC 2008 Full report, para 47)

Some of the emphasis that many respondents wanted was therefore there, but it came late in the PwC report: there is no introduction to Section 4 of the Review, to put the PwC research into a wider policy context.

There is no mention of OUV in the PwC Executive Summary until p.14, and here, it comes under "2. Is it (i.e. WH status) achievable, rather than "1. Why do we want to become a WHS?"

Unfortunately, cost/benefit is as a result being understood and used as a criterion in itself, rather than as an aid to be used in deciding whether to put forward a Site which the applicants already judge to meet the UNESCO criteria for OUV.

5. FUTURE NOMINATIONS FOR WORLD HERITAGE STATUS

5.1 THE QUESTION

The Review asked the following question, offering three options:

Question 1: 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 for World Heritage Status?

- *Continue to nominate annually from our existing Tentative List;*
- *Suspend new nominations for a period;*
- *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 (our preferred option)*

(The option to consider alternative designations such as a National Heritage List or the European Heritage label will be dealt with in the next section.)

5.2 THE RESPONSES

Not all respondents were in favour of or against each Option. 13 respondents did not in fact answer Question 1 at all: most of these were responses which had concentrated on supporting TL Sites or proposing new TL Sites. The Review also did not specifically ask people to decide against Options, so that the numbers of responses against any Option can only indicate perhaps where respondents had particularly strong views.

NB There was slight overlap in support between Options: some respondents favoured a phased approach taking in more than one Option.

Responses are summarised, as respondents frequently made the same or similar points. Full responses can be found in Appendix 1.

5.3 RESPONSES TO OPTION 1

There were five responses in favour of Option 1, and 20 against it. Most respondents ignored this option, and most who opposed it did not give specific reasons.

Arguments in favour of Option 1:

- The quality of the UK TL in 1999: Sites were subject to extensive expert analysis and broad public consultation, and were selected in response to the Global Strategy.**
- Loss of community impact which has been, and can be, achieved by external corroboration of outstanding significance.**
- Removal of sites would threaten and undermine progress to date in promoting significance of our heritage, and set a worrying precedent for sites included in future TLs, who will need to secure stakeholder commitment to nomination work.**
- More nominations, not less, should be made: interest in WH status is increasing and any changes in selection of potential sites should reflect this.**

Arguments against Option 1:

- Cost**
- Inconsistent with WHC priorities.**
- Unsustainable beyond the next few years; would bring the system into disrepute by over-nominating UK sites.**
- Periodic review should allow for removal of Sites from the TL**
- Would exacerbate geographical imbalance.**

5.4 RESPONSES TO OPTION 2

There were 6 responses in favour of this option, one “maybe”, and 26 responses against it.

Arguments in favour of Option 2:

Most of these demonstrated an unease at current trends in policy towards WH in the UK, and saw this Option as an opportunity for re-assessment:

- Nomination of too many WHSs tends to diminish the value of those already inscribed.**
- Supported, but only once all Sites which demonstrate OUV are nominated.**

- Would provide an opportunity to 'refresh' perceptions of WH listing, in view of the current trend to view WHS designations as a key to unlocking funding and as a tool for regeneration rather than one for protection and conservation.
- A means to reconsider current TL sites over a 3 year period because of the negative implications of inscription for development: i.e. sites "in aspic".
- Would enable the UK Government to encourage and consolidate the education and interpretation work at existing WHSs.
- Would have a beneficial effect in demonstrating the UK's seriousness in addressing imbalances in the List: should be for no more than 5 years, and should be used to develop possible nominations and a sound TL.
- Would enable current issues over approach to conservation to be resolved between the UK government and UNESCO.
- A possibility in the short term.

Arguments against Option 2:

- Unnecessary and unreasonable.
- Would lose the impact that the nomination process and status can have on the protection and conservation of heritage.
- Would lead to a gradual disengagement with the WH process and deny opportunities to potential sites.
- Would not be cost effective for well founded and advanced bids, and would give little confidence in any further process for nomination.
- No sound rationale behind the statement that additional sites will 'devalue' the brand and dilute the perceived significance of existing WHSs: the UK "has been innovative in pushing the boundaries for inscription".
- Ceasing nominations before all sites of OUV have been added to the List would detract from the quality of the List, and serve to incompletely represent Britain's contribution to the world.
- Laudable, but unlikely to be an example followed by member states.

Several of the respondents opposing Option 2 made the case for Sites with already well developed bids.

5.5 RESPONSES TO OPTION 3

There were 85 opinions in favour, and 2 “maybe’s”. There was one opinion against Option 3.

Arguments in favour of Option 3:

Most supporters of Option 3 gave their support with qualifications. Some were concerned at the possible abandonment of the 1999 TL:

- The Secretary of State should examine first the sites presently included on the 1999 TL before considering new aspirants to be included on a revised TL. The selection of the 1999 TL was undertaken after a rigorous selection process and its findings have been found to be sufficiently robust that sites on this list should not need to reapply.

In many cases, and in particular in the responses supporting the Lake District and Chatham, Option 3 was favoured subject to priority being given to Sites that can display that they have already invested time, resources and public money in developing a sound bid. Suggestions with regard to such sites were as follows:

- There should be automatic entry to the next TL for sites with advanced bids and prioritisation for the next nomination opportunities.
- A transitional arrangement for handling those sites on the current TL whose preparations are well advanced should be made: a “fast-track” process, to be carried out before introduction of the formal 2-stage application process.
- There should be a Government review of each of the outstanding sites (on the TL) in open consultation, nationally and locally, discarding those that have no chance of success.
- The requirements of any new regime should be fair and proportionate and avoid the duplication of earlier work and the imposition of onerous burdens on Sites already identified in the existing TL.

Many of the 34 responses backing Chatham and/or the Lake District supported Option 3 on condition that Chatham and the Lake District are subject to Stage 1 and 2 assessments as soon as results of the Review are announced.

The two-stage process of application was almost universally supported, on the grounds that it would:

- allow a broad range of sites to be put forward at the first stage.
- provide a “level playing field”;

- be a more sensible and pragmatic approach;
- be a more transparent and rigorous process;
- avoid weaker candidates being put forward;
- allow for greater consideration of the worth of Sites, especially important in the light of the findings of the PwC report;
- be possible to adjust, to allow Sites with well-advanced bids to be fast-tracked in the first stage.

... with the plea that:

- Stage 1 of selection must focus on OUV. All other factors must be secondary. This should save unsuitable candidates from wasting time and resources.

Other arguments again reflect the need, seen in responses to Option 2, to take time to review process and resourcing:

- Stop new nominations for a set period: meanwhile, the application process should be refined.
- Existing WH Sites should be better and more fairly resourced in return for slowing down inscription. Resources should be restructured and systematised and central funding made available for national promotion.
- The UK should slow down the rate of nomination considerably: in England in particular perhaps to one new site every ten years. This would allow focus on the better management and protection of the existing 17 WHSs. Delay may also make clearer the true gaps within the existing WH List which might be filled from within England in the future.
- A fast track process should be followed for Sites which are currently well through the nomination process, with efforts to be focused on existing WHSs, promoting improved management and funding.

Slowing down nominations was also seen as meeting with UNESCO policy:

- Slowing nominations reflects both the need to address the global imbalance and provides an opportunity to contribute to UNESCO's and the UK's Government aims. Funding released by periodic nominations rather than annual ones could be used to help Sites in developing countries. (eg Hadrian's Wall in relation to some other parts of the FRE).

- Phasing bids will strengthen the individual bids and maximise the value of WH status.

The number of UK heritage sites meeting the criteria of OUV is finite; therefore it is appropriate that nominations should slow.

... with one respondent exhibiting caution:

- The UK should only reduce to nomination every other year if other European countries (especially those which have more sites than Britain already) do the same.

Arguments against Option 3:

- Places too many hurdles in the way of proposals for WH status.

5.6 FUTURE IDENTIFICATION, NOMINATION AND DESIGNATION POLICY: Issues raised

The majority of respondents accepted that the UK WH List may have to be finite, and some commented that they felt that there was a danger of devaluing the “brand”.

5.6.1 Sites on the current Tentative List

The strongest concern emerging from responses was with regard to the handling of sites on the current Tentative List which have already committed large amounts of money and time to the preparation of nominations. The single most controversial section of the Review is found in 5.16 Procedures for Sites on the Tentative List; in particular the statement that:

There will be no presumption that because a site appeared on the old Tentative List it should have no place on the new one – nor that it should receive preferential treatment. Each case will be considered on its merits. (DCMS 2008 World Heritage for the Nation, p.32)

This has raised considerable alarm. Comments have been made that the proposals:

- do not take into account the amounts of money which have been committed to preparing nominations;
- do not take into account the amount of work put into building awareness of World Heritage and its opportunities;
- threaten the credibility of the current Tentative List sites;
- threaten to weaken public support;

- would weaken private sector sponsorship;
- create even more uncertainty about the prospects for nomination in the future;
- make no concession in advance to the fact that existing Tentative List sites may already be fulfilling the criteria they seek to impose.

Most respondents however approve of the idea of a two-phase application, which they agree would streamline the process, and prevent future waste of effort and funds.

5.6.2 Composition of the Review Panel

There were concerns (each from one respondent) that:

- there were no Terms of Reference for the new panel.
- the government should not change the current system for the devolved administrations, in which candidates for the TL are nominated by First Ministers, as this system was felt to be more likely to redress the disproportionate number of inscriptions in England.
- it would be inappropriate for the selection process to be chaired by English Heritage, as it was felt that this would work against the democratic arrangement currently in place. The process should be overseen by DCMS through an independent and/or UK-wide chair, and EH should join Historic Scotland and CADW as national advisors on the panel.
- Defra and IUCN UK should be full new members of the panel to draw up the new shorter TL
- the Country Landowners Association should be asked to join the Advisory Group for the Policy Review, as its 36,000 members own and often manage and pay for a large proportion of the UK's heritage.

5.6.3 Timetabling

Applications to the TL

Several respondents commented that the timetable was far too short to allow Sites to prepare for the two stage application generally favoured, in Option 3: both the 6 months suggested for analysis of Stage 1 applications and the 4 months provided for successful Stage 2 candidates were considered to be insufficient.

There was a request for clarity about the level of detail needed at Stage 1 of application, before deciding on a timetable, and concern that if additional detail is asked for at this stage, there does not appear to be time in the proposed timetable.

The current timetable is seen as being targeted at bids on the current TL. 2 months for Stage 1 is considered too short a period for sites beginning from a standing start. 3-4 months was suggested, with a second opportunity to make a Stage 1 submission before 2012.

Nominations to UNESCO

There were many objections to the fact that no site would be nominated in 2011, so that no site will be inscribed during the Cultural Olympiad. This is seen as missing an opportunity to showcase heritage during a period when the UK will be the focus of international attention, failing to meet the first of the Review's Terms of Reference (i.e. "protecting and promoting").

Several respondents recommended the spacing of nominations to suit the needs and capabilities of aspiring sites rather than to fit a rigid timetable.

It was also noted that the current timetable would have the effect of putting "in limbo" Sites where active work is being undertaken between now and the finalisation on the new TL. It was felt that the practicalities of sustaining funding for aspiring Sites must be understood and respected, and the difficulties that would ensue if work was suspended for two years acknowledged.

5.6.4 Resourcing of nominations

There was great concern about resourcing for WHSs expressed in responses. It would be interesting to know whether, if the Review had announced that no further resourcing will be available in the foreseeable future (which is a likely outcome given the current financial climate), more respondents would have opted for suspending nominations for a period.

5.6.5 Other issues

The desirability of integrating intangible heritage retrospectively into the nomination documents of current WHSs was raised, as well as the need to take it into greater consideration in future nominations.

6. ALTERNATIVE DESIGNATIONS

6.1 THE QUESTION

As the fourth part of Question 1, the Review asked:

Should we consider alternative designations such as a National Heritage List or the European Heritage label?

6.2 RESPONSES TO OPTION 4

Responses fell mainly between cautiously positive, and very negative. Relatively few respondents were unreservedly in favour. The lack of detail available in the Review caused many respondents to hedge their answers, so that a “maybe” category has been introduced here.

Full responses can be found in Appendix 1.

6.2.1 Arguments in favour of Option 4:

The alternative designations suggested were seen as being:

- complementary to the WH process;
- opportunities for aspirants to develop proposals for an appropriate heritage status; would perhaps allow movement upwards (and downwards);
- clarification for consumers of what is important.

The European Heritage label received the following support:

- The lack of this sometimes disadvantages cultural heritage considerations in relation to the natural heritage.
- The label would give focus and wider significance to sites that are unlikely to become WHSs but for which there is a local determination to management under international heritage best practice.
- Would favour making greater use of the European Heritage Label as we are clearly part of the European continent, and the UK is under-represented (in terms of WHSs within Europe)

Such status only enhances the importance of a site and is not really duplication, as nature sites already benefit from European and UK protection.

The concept of a National Heritage label received three positive responses:

- There should be a new national designation that protects historic towns and cities holistically.**
- Designations of alternatives might provide potential sites for nomination as WHSs at a later stage.**
- A National Heritage List, if it included WHSs and TL Sites and if all Sites on the List had national protection, could help to clarify the status of WHSs, through giving them national status, and provide for TL Sites a stepping stone towards WHS inscription. We do not however consider that such a national list could or should be seen to supplant nominations for WH status.**

Overseas Territories and Crown Dependencies

There was a suggestion that a strong case could be made for the Government providing greater support to UKOTs/CDs wishing to adopt some other system of alternative designation, tailored to the particular needs of the territories.

6.2.2 Option 4: maybe?

Planning, protection and management

- A National Heritage List or European Heritage Label could potentially be valuable tools for promotion.**
- The European Heritage label could be consistent with the protection of cultural heritage assets at a European level in line with the protection of natural habitats.**
- “National” and “European” designations provide a useful hierarchy of designations, but none would be worthwhile if they were not suitably protected, publicised and funded.**
- Supported as long as new designations do not undermine or cut across sites with WH status.**

Time and resources

- **Alternative designations do not conflict with WHS designation, but if they require involvement and/or contributions from the Secretary of State, this could put additional pressures on the Department at the expense of work on WHSs.**

Benefit

- **More work is needed to establish the wider benefits of the proposals.**
- **DCMS' position of waiting to see what happens with the European Heritage Label before committing one way or another seems prudent.**
- **The desirability of such designations, which would inevitably have their own discrete costs and benefits, should be examined in their own right rather than as alternatives to WH inscription.**

6.2.3 Arguments against Option 4:

The following potential problems were noted:

Planning, protection and management

- **The danger of complicating planning and protection: at odds with the Government's commitment to simplify the heritage protection system.**
- **Could undermine protection for sites of only national significance.**
- **Existing heritage designations are already embedded in the planning framework and can be assessed against broader economic, social and environmental objectives.**
- **There is a lack of real evidence that there would be any additional benefit. The unified Register of Heritage Assets proposed in the Heritage Protection Bill and the proposed national designation system would be more useful.**
- **There is a risk of confusing visitors and local communities.**

Time and resources

- **Implications for time and money if each accreditation had very different priorities and processes, and needed different documents and management plans.**
- **Issues of workload during bidding, probably comparable to nominating WHSs.**

- **Implications with regard to costs and responsibilities, probably comparable to managing WHSs.**
- **The need for an appropriate heritage body which understood the different designations, and could advise.**

Benefit

- **The possibility that there may be little merit, for natural sites, in what would amount to a parallel system.**
- **The risk that a European Heritage Label could be read as “not quite WHS standard” or even a failed WHS, especially if the establishing criteria are not well-defined.**
- **Not true alternatives to WH inscription: would presumably have to conform to a different set of criteria to reflect the political framework within which they were devised.**
- **Benefits of ‘second tier’ designation are highly unlikely to outweigh the costs of the additional bureaucracy involved.**
- **The time it would take for the alternative to gain prestige.**

International balance

- **The European Heritage Label could add to the predominance of European sites in international listings.**

7. FUTURE PROTECTION, MANAGEMENT AND PROMOTION OF WORLD HERITAGE SITES

Question 2: What further measures should be considered to improve the management and promotion of our World Heritage Sites?

7.1 PROTECTION

7.1.1 UNESCO policy

The following suggestions were made:

- 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.
- The impact of development on WHSs 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.
- Buffer zones must be relevant and proportionate: there should be no automatic assumption of a zone of a certain size eg a 10 mile Buffer Zone around Hadrian's Wall.

7.1.2 UK Heritage protection policy: general

There was concern that UK protection policy does not take into account the responsibilities and holistic approach required of signatories to the UNESCO WH Convention, and the following recommendations were made:

- UK policy and guidance should incorporate and define the concepts and terminologies of the international heritage community. (NB UK policy for listed buildings and conservation areas does not mention "values", "authenticity" or integrity, and "authenticity" is not officially defined).
- There should now be further review of UK policy and guidance in order to bring it in line with international expectations and standards.
- 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 WHC 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.
- Perceptions of the purpose of WHS status should be refocused more strongly towards conservation.

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

One respondent commented that re-evaluation of the geographical boundaries of all WHSs would be beneficial, in light of the sounder understanding of how the boundaries of a WHS need to be defined, as long as this would not require a new submission of Sites to UNESCO.

There was support for the strengthening of planning controls over WHSs, with a presumption against large developments near a WHS. It was pointed out however that protection is not always ensured through the planning system:

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

- There is a need to ensure that the utility companies comply with standards to be adopted in the Supplementary Planning Document, particularly 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.

There was some comment however on the danger of concentrating on WH, perhaps at the expense of other assets:

- Protection and management regimes should not vary greatly, if at all, between sites which by an accident of policy or timing find themselves on the WH List and those for whom the door is shut eg St. Paul's Cathedral should be protected no less than Canterbury Cathedral. This would show full commitment to the WHC, take away pressure to add new sites to the WH List, and eliminate perceived or actual anomalies between the designation of sites of equal heritage value within the UK and renowned as such worldwide.

7.1.3 Statutory protection

Achievement of statutory protection for WHSs was seen by many as demonstrating the seriousness with which the UK regards its commitments under the WH Convention. Many saw this as happening through the Heritage Protection Bill, and it was further suggested that:

-this should be ensured by WHSs being explicitly named as Heritage Assets in the Statutory Instruments allowing the provisions of the Planning Act 2008 (ref. Section 32: meaning of "development") to be brought into force.

The most widespread concerns were represented by the following comments:

- The introduction of stronger, preferably statutory measures for the protection of WH Sites is essential, and that this should be implemented through the passing into legislation of the Heritage Protection Bill, the creation of the new PPS to replace PPG15 and 16 (the new PPS should reflect the UK's responsibilities under the WH Convention), and the enforcement of Article 1(5) Land.

- Local Authorities must be persuaded to take their responsibilities for WH sites seriously

It was further suggested that:

- the requirement for agreed statements for each of the WHSs should be introduced in the proposed Heritage Register, to enable the UNESCO statement of OUV to be translated into limp and practical policies protecting these Sites.

There was however concern also that protection should not be overly complicated bureaucratic and convoluted, referring to the already existing layers of protection for Sites.

Several respondents felt that the existing models of protection could be used, such as those for National Parks, AONBs and SSSIs.

One respondent felt that the problem was not one of lack of protection, but of politics i.e. Government or Local Authorities overruling the protection system. The solution was felt to be political lobbying by UNESCO, ICOMOS, or national and local bodies. They also doubted that additional regulation would be matched by additional public benefit.

7.1.4 Centralisation and consistency

There was much support for the need for a unified approach to heritage in the planning system.

Several respondents commented that coordination was also needed 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 WHSs 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.

- UK wide protection, support, research, guidance and funding in relation to climate change and WHSs should be developed and progressed.

Many respondents agreed that there should be better coordination between Government ministries, departments and agencies, with regard to the protection of WHSs.

One respondent commented, for instance, on what they perceived as a widening gap between the Government's aspirations for heritage protection as expressed through DCMS, and its actual commitment to delivering it through the CLG.

It was suggested that Government should:

- work with CLG to clarify and consolidate recent initiatives emerging from planning reform and in particular address emerging LDDs, climate change, and renewable energy.**
- ensure that where WHSs are known to be at risk, it works with local stakeholders to assess that risk and undertake appropriate remedial action.**

7.1.5 The Local Authorities

There was some sympathy for the position in which Local Authorities find themselves (both from without and within the authorities) and respondents felt that they needed both better guidance and better resourcing:

- Although WHSs have protection within the planning system, through local and other Plans, how their OUV and attributes are taken into consideration when impact assessments are made is still profoundly unclear, with the result that many Councils find it difficult to put into practice satisfactory systems for evaluating the impact of proposed development.**
- 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**

However, it was also felt that:

- WHS 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.**
- Local Authorities should have policies in their Local Development Documents which are designed to specially protect the OUVs 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 LDF.**

policies for the protection of WHSs should be introduced into LDP/LDF's as soon as feasible following inscription.

7.1.6 Guidance

There was a large body of opinion that more guidance needs to be provided with regard to the protection of Sites and the requirements and responsibilities of the WH Convention, tailored to:

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

Respondents asked for guidance on:

- the responsibilities resulting from of WH status;
- what is included in a “setting”;
- the definition, administration and management of Buffer Zones;
- the responsibilities of Local Authorities, to protect WHS setting and context from developments beyond the Buffer Zone of the Authority in which the Site lies;;
- the implications of WH status on future development, and in particular large developments, and tall buildings;
- what constitutes a “significant development”;
- clarification on costs and detailed requirements relating to the recent extension of Article 1(5) Land to include WHSs;
- who can make representations to the WH Committee.

Assuming that the new Planning Circular and accompanying EH Guidance Note are formalized, it was suggested that DCMS collate good practice from Local Authorities which have successfully integrated the Circular’s policy into their Local Development Frameworks, as guidance for other Authorities, and that there should be periodic reviews of planning decisions and development to assess the effectiveness of guidance.

One respondent complained that they felt they had been misled by being assured repeatedly beforehand that WHS status brings no extra controls.

7.1.7 Resourcing

See 7.3

7.18 The Overseas Territories and Crown Dependencies

It was felt that there is a strong case for reviewing what mechanisms (beyond the possibility of WHS status) are in place for protection and appropriate management of the important heritage of the UKOTs/CDs.

7.1.9 The public, and local communities

Comment was made that:

- WH status can actually generate community self-management programmes, or environmental awareness programmes, which contribute to the protection of the Site.

- Effective conservation and planning regulations must allow WHSs to function as living communities.

Full responses can be found in Appendix 2.

7.2 MANAGEMENT

7.2.1 Government management structures

There was strong feeling that:

- there is a need to acknowledge wider departmental and agency responsibilities for WHSs beyond planning and conservation, and to map the involvement of government departments in the WH process.

- all government departments and agencies whose actions can affect WHSs must themselves be thoroughly aware of their responsibilities, particularly CLG and Defra (and its agencies).

- there should be greater clarity about those lines of responsibility and how they are shared and/or devolved.

- the roles of NGOs and owners should also be included in the discussion about the need for clearer lines of responsibility.

- there should then be much more coordination between Government departments and agencies, including Defra, the FCO and JNCC, in order to meet Government's aims and obligations with regard to the Convention and UNESCO. This should be led by DCMS.

This is a particular issue for the Jurassic Coast, where it was felt that the respective roles of and relationships between between EH, Natural England, DCMS and Defra still need clarification.

- it would be highly beneficial for most departments to have WH policies

- there needs to be a consistent approach across Government departments in assisting those local authorities with management roles for existing Sites.

- the UK Government should also work in close partnership with the devolved administrations, forming a stronger central role relating to the support and management of the UK's WHSs.

This should include:

- a coordinator for each site**
- facilitation of best practise**
- stronger reporting mechanisms**
- clearer guidance**
- easier access to help and support**
- setting of standards**
- improved coordination across administrations**
- improved coordination between natural and cultural interests**
- improvement of the skills base.**

7.2.2 Site management

There was strong feeling that site management needs a coherent, national, management strategy linked to resource allocation, with a focal point to coordinate activities more widely than in only conservation and planning, through:

- maintaining a commitment to best practice protection, management and presentation;**
- links between WHSs and wider Government agendas such as sustainable communities, healthy living etc;**
- optimising capacity to deliver education, citizenship, sense of identity, well-being, and sustainable development;**
- promoting international collaboration in line with the UK UNESCO bilateral cooperation agreement.**

Many respondents support the need for a full time WHS coordinator at each Site.

7.2.3 Management mechanisms

The following suggestions were made:

- There must be clear accountability through the Local Authority for ensuring that an appropriately constituted Steering Group is in place for each WHS, that it is functioning effectively and that the Management Plan is adequately resourced and is being implemented properly.**
- DCMS should consider whether the management structures adopted by the individual WHSs are strong enough and well enough resourced to deal with the level of complexity of each Site**

- There should be effective Government mechanisms for intervening if local arrangements fail to deliver the required results.
- A Scottish WH Forum should be set up to share best practise
- There is an understanding that the Steering Group has a “mandate to manage” the Site from DCMS, but this has never been confirmed formally or in writing. The situation on existing WHSs should be clarified.
- A formal mandate to manage would be good practice for all Sites.

7.2.4 The management plan

There was widespread agreement that an effective, integrated management plan for each Site is of central importance, giving focus and direction, which helps to progress projects, and that the process of creating a management plan fostered a sense of partnership among key stakeholders.

The following additional points were made:

- There needs to be a closer connection between the OUV of the Site, and the management plan.
- The plan must recognise social, environmental and economic values and the responsibilities that pertain to them.
- There should be greater integration of learning and education strategies within the management of sites.
- Management plans should include an equality plan, providing a clear statement of how the issues around equality and diversity will be addressed as part of ongoing management
- All management policies must comply with sustainability guidelines but must also sustain the OUV of the Site. This must be considered when estimating benefits from tourism and regeneration.
- Delivery of softer benefits should not be seen in isolation, but rather should be seen as a mechanism for delivering Government objectives such as the sustainable communities programme, healthy living programme, education, citizenship etc.
- The management plan should set out how the Site would operate in a financially independent manner.

7.2.5 The stakeholders

The following points were made:

- Wider consultation amongst those concerned would be welcomed, including local residents and amenity societies, on the management of existing WHSs.
- There is a need to involve local communities in decision making and consensus building. Links with the European Landscape Convention in this respect should be emphasised.
- Stakeholders should include a significant number of owners of property in the WHS.
- There is a need for increased communication with landowners to ensure that they are aware that their land lies within the boundary of a WHS; especially pertinent in areas of wide geographical distribution e.g. Cornwall and West Devon Mining Landscape and Hadrian's Wall, particularly during the nomination process.
- It would be beneficial for DCMS to provide clear guidance for landowners on implications of being in a WHS and on their responsibilities.

The following comments illustrate some of the potential challenges and contradictions of stakeholder engagement:

- A WHS needs to be thought of as one cohesive entity, without compromising the autonomy of the individual stakeholders.
- The issue of dominant stakeholders must be taken into account in both the structuring of the Management Plan, and in ensuring that guidance with regard to implementation is independent of dominant interests.

7.2.6 Management skills

- Nationally led capacity building for WHS coordinators and Local Authority planners should be designed and implemented.

7.2.7 Management emphasis

The following possible areas of emphasis for/approaches to the management of WHSs were suggested:

- Concentration on care for existing Sites;

- **Improvement of access (physical and virtual) to all Sites;**
- **The need to strike a balance between the needs of conservation, access, the interests of the local community, and the achievement of sustainable growth;**
- **The development of research agendas on how WHSs can contribute to, for instance, civic pride and social capital;**
- **Use of WH to raise awareness of global issues and hence to act as a means of achieving both UNESCO's mission and the UK Government's aims and commitments to the developing world – especially Africa – and in dealing with climate change and international sustainable development;**
- **Consideration of how the seabed would be managed if designated in the future, especially in relation to defence related activities such as dredging;**
- **The sensitive incorporation of protection and management of WHSs into visions for regeneration;**
- **Management approaches that take account of the reasons for inscription and the diversity of additional interests that sit within WHSs;**
- **The greater integration of intangible heritage into the Statements of Significance of existing and future WHSs;**
- **Better integration between natural and cultural sites.**

7.2.8 Control

There was particular concern from one stakeholder about the maintenance of control over the management of railway sites: it was stressed that maintenance and further development of the railway must not be impeded, Permitted Development Rights must be retained in all cases, and decisions with regard to performance and safety must remain with the stakeholder.

7.2.9 Managing change

Several respondents expressed concern at the possibility that WHS status would put Sites 'in aspic', impeding economic development, and others viewed change with apprehension:

- **There needs to be a recognition that history is a continuum and that some change is inevitable to respond to new technology and the modern world and that, unless that degree of change is permitted, there is a risk that the asset will deteriorate.**

- **Allowing dynamic urban areas to develop will require careful consideration to policy development and future management of sites: it was pointed out that if there is a perception that it is unreasonably difficult to get permission in a WHS, this will affect the local economy.**
- **There should be appropriate policies in management plans, clarifying planning guidance to apply to issues such as tall buildings.**

7.2.10 Guidance

Several respondents expressed the need for a high level code of practice, or set of aspirations, describing what WHS status means and requires in the UK, to:

- **provide clear guidance for managers and planners;**
- **aid appreciation, understanding and protection of the context of sites as well as of their specific features;**
- **help to empower local groups to better manage and have a real sense of ownership of Sites;**
- **ensure that benefits of WH status are realised;**
- **make clear the processes involved in the future if a Site wishes to pursue boundary changes, changes to or introduction of buffer zones, or international linkages;**
- **make it clear that change is not automatically wrong, but may be necessary and desirable.**

7.2.11 Networking

There was almost universal support for the need for a better central network, in order to:

- **put the management of WHSs on a firmer footing by promoting a consistent approach to management;**
- **pursue shared goals/concerns;**
- **share experience and examples of good practise between existing UK Sites, and also aspiring Sites;**
- **share experience of capacity development, communications, skills, international cooperation, evaluation and risk;**
- **share results of research;**
- **provide better communication about relevant UNESCO/ WHC developments.**

- The organisation running the network should provide regular meetings, site visits, and training sessions.

National and international partnerships established by the Jurassic Coast, Kew, and the Frontiers of the Roman Empire WHS were cited as useful exemplars.

Most respondents were in favour of a new body, or at least a remodelling of existing networks such as the LAWHF. The organisation of AONBs was cited by several respondents as a possible model. Work was felt to be needed to define the role and character of such a network, particularly if it builds on existing networks.

One respondent commented that a new bureaucracy was unnecessary, as there were opportunities for WHS coordinators and others to meet and/or communicate good practise by email.

The International National Trusts Organisation (INTO), twice-yearly meetings of WH Coordinators, and other as yet unexplored mechanisms were felt to be worth consideration.

7.2.12 International cooperation

Stronger international links were welcomed by some respondents:

- Opportunities should be developed for cooperation with partners from neighbouring State Parties and those with transboundary site connections with a view to mutually informing and improving management principles and promotion.

- Each WHS Steering Group should be able to call on international expertise to advise it, through the network proposed in 7.16.

- There should be greater joint working between UK Sites and other “like” Sites to maximise benefits of inscription.

7.2.13 Reporting

It was suggested that at the same time as the Periodic Report, Governments should report on the state and/or development and impact of their learning and interpretive services at Sites in their territories.

Full responses can be found in Appendix 3.

7.3 FUNDING

Funding generally for the protection, management, and promotion of WH 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 3, there should in return be improved funding for existing WHSs.

7.3.1 Funding from central Government

There was very widespread support for a consistent and transparent national system of funding and resource allocation for all WH Sites, with core funding, to finance:

- a full time Coordinator at every WHS;
- assurance that coordinators are not losing time seeking financial support for their own salaries;
- the research, conservation and management of WHSs, providing secure annual budgets the promotion of WHSs;
- networking and sharing of best practice, perhaps through the LAWHF;
- resourcing of English Heritage to be able to provide support with regard to protection, though with some reservations. It was pointed out that, for instance, enhanced call-in procedures would be welcomed, but they would only be effective if English Heritage were provided with sufficient funding and staff to take on concomitant responsibilities. Otherwise, potential dangers were seen in giving English Heritage the last word in recommending call-ins for WHSs.

It was suggested that a proportion of total funds should be allocated nationally and that these should be supplemented locally, possibly through RDAs, and through grant in aid to local authorities.

It was felt that:

- the responsibilities bearing on Local Authorities should be recognised by Government in the above funding; specifically, when a WH Site is included within Local Area Agreement targets.
- it is unreasonable to expect hard-pressed Local Authorities to increase investment in what is a discretionary function.
- it is very important that it should be understood that benefits accruing from the financing of WH will often be intangible, or "soft", and that these have considerable value: it was pointed out that Sites can deliver social capital, but this requires funding and staff time to deliver.

7.3.2 Other funding

Suggestions were made that:

- WHSs should be eligible for grant aid within the Planning and Compulsory Purchase Act.**
- there may be a case for central government targeting grant aid for improvements in management and presentation of the existing WHSs in the UK.**
- funding could come from local partnership initiatives, the private sector, and the Heritage Lottery Fund.**
- national funding agencies need to be made aware of the overriding importance of WHSs, and to work this into their funding policies and priorities: DCMS could play an active role in this.**
- advice should be provided about funding sources.**

It was noted that Cathedral funding is determined by criteria which do not factor in their importance as WHSs, and which can work against them.

7.3.3 The Overseas Territories and Crown Dependencies

It was pointed out that the OTs and CDs are a special case, with natural Sites in the OTs urgently requiring increased funding for their management because of problems of invasive alien species. OT administrations such as Tristan de Cunha and Pitcairn Island 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 WH in Danger List.

It was suggested that:

- there should be increased resources allocated to the OTs through the opening up of National Lottery funds, not currently available to them.**
- confusion in the lottery bodies between UKOTs/CDs (which are UK territory) and Commonwealth countries (which are not) needs to be addressed.**

Full responses can be found in Appendix 4

7.4 PROMOTION

Promotion has been interpreted as both general awareness-raising, and marketing for tourism, and responses have been arranged accordingly.

7.4.1 Awareness-raising

There is repeated mention of the need to raise awareness of WH: among residents, schools, visitors, planners, politicians, the media, and tourism outlets, and there is a suggestion that the promotion of WH status should be a formal duty, resulting from inscription.

Key issues needing promotion are felt to be:

- the role of WHSs as key assets, especially at the level of national and regional funding bodies, and national, regional and local development agencies;
- the existence of misconceptions about inscription: that it brings automatic access to cash; that it is a statutory planning designation; that it stifles local enterprise and development;
- improved understanding by managers, planning authorities and local people, of what is required under the WHC.

7.4.2 Tourism marketing

- A marketing plan should be developed to benefit from inscription, raise awareness, increase participation in protection and presentation, and increase pride and local identity
- Concepts of sustainable tourism centred on, but not exclusive to the WHS must be developed, with a supporting effort to ensure such outcomes such as longer dwell time in the region. This in itself will not only increase local benefit but also make the visit more meaningful in cultural and educational terms.

7.4.3 Centralised action

As with issues of protection, management and funding, it was felt that action is needed by central Government to coordinate promotion, and that this must be sustained, consistent, and properly resourced. Awareness of Sites is felt to be good at a local level, but often very poor at the national level: hence better coordinated national promotion is needed.

Opinions about the role of Government were as follows:

- DCMS should have a programme to promote and publicise inscribed sites in the UK and abroad.

- The lead role of DCMS in promoting the value of WHSs in ensuring that Local Authorities and other government departments are aware of the economic and social benefits of WHS status is vital.
- Government can contribute to raising awareness of WHSs by contacting directly, Leaders and Chief Executives of Local Authorities to encourage them and enlist their corporate support.
- Government should support the Local Authorities to enable delivery of awareness raising and promotion.
- Government should take the lead nationally for the promotion and awareness raising which would assist in raising civic pride and thereby social capital.
- Some of the lesser known WHSs should be encouraged and funded to provide greater access to and information about the Site and raise awareness at a national level.

7.4.4 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.

7.4.5 Promotion through education

There was far more interest in the potential of promotion through education on WHSs than for instance through tourism.

The great potential of education through WH and WHSs was much discussed:

- There are strong links between WH and issues of Citizenship as taught in the National Curriculum.
- There is a special relevance for WHS education in highlighting awareness of heritage leading to reflection on identity, appreciation of diversity and leading in turn to increased respect for our own and other countries’ cultures and care for heritage.
- WH 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.
- The UK is in a good position to use WH Sites as beacons of good practice in relation to the issues which face the wider heritage nationally and internationally. Somerset Levels and Moors would be an ideal Cultural Landscape in which to develop robust and effective

solutions to the threats of climate change and sea-level rise which endanger wetlands and their heritage around the globe.

- The educational potential of the WHS designation process itself is important: it could be used to strengthen pride in the locality and to help young people to connect with a proud and creative past.

The following suggestions were made:

- WH and other heritage issues should have a greater place in schools curricula.**
- There should be a joint strategy for WH education, with support from the Government, particularly in the form of project funding and profile raising.**
- There should be a concerted effort, driven by the four UK administrations, to increase educational activities relating to WH – natural and cultural, with secured funding, and educational and research strategies being supported at each UK Site.**
- The Jurassic Coast is leading on a UK-wide project with all WHSs to help coordinate educational strategies and programmes: this should be encouraged and properly resourced at a national level.**
- Education programmes currently used at WHSs and at other sites should be assessed in order to learn from the best.**
- Sites should have linked educational and interpretative strategies.**
- There is potential for contributing to cross-curricular and interdisciplinary initiatives within formal education, and intergenerational, family focused learning.**

A kit similar to the UNESCO “World Heritage in Young Hands” material should be developed for adult and family audiences.

7.4.6 Promotion through research

- Increased research (eg excavations) can be used to raise awareness.**

7.4.7 Community involvement

It was felt that:

- greater emphasis is needed on locally based activities at WH Sites, particularly support for community involvement in the care of the Site.**

- there need to be stronger networks for sharing and learning, especially with regard to the understanding significance and values in local communities.

7.4.8 Major events

The Cultural Olympiad was seen by many as a natural opportunity for the promotion of heritage in the UK, during which WHSs should be encouraged to take a lead with a range of local and regional activities.

Several respondents requested that the link between WH and the Cultural Olympiad should be recognised and promoted by nominations in 2011 and 2012. It was pointed out that 2012 coincides with the 40th anniversary of the World Heritage Convention.

It was also pointed out that there are limited, if any, references, to the historic environment in the DCMS tourism strategy for 2012 and beyond.

The Commonwealth Games was seen as another possible event which could be used for promotion.

7.4.9 Other vehicles for promotion and awareness-raising

- DCMS' Non-Departmental Public Bodies;

- agencies such as VisitBritain;

- the Earth Science Education Forum for England and Wales, and the Scottish Earth Science Education Forum: could promote awareness of WH landscape and geology ;

- UK World Heritage Tours: establish new incoming tourist routes within the UK to sit alongside those that are already well established;

- national champions for each WHS: responsibility would be to ensure that the full values of their property are understood at all levels and that proper attention is given to delivering the softer benefits. Such a champion would not be the same person as the Property Manager;

- use of the WHS logo: simplification of the rules regarding use of the WH logo would be welcomed).

One respondent however questioned whether investment in more widespread use of the WH logo would deliver much return if not accompanied by a proactive national campaign in promoting WH values and explaining what the logo means.

Full responses can be found in Appendix 5.

8. EQUALITIES IMPACT ASSESSMENT

Only two respondents dealt with this issue: one in very general terms, offering cooperation in the future, and the other in terms of dealing with racial inequity. Issues for rural areas were not taken up.

9. COMMENTS ON THE STRUCTURE AND CONTENT OF THE REVIEW

Although one respondent wrote that “Most of the issues that have been raised in the consultation paper have been clearly and comprehensively explained ... in stark contrast to the PwC report”, many other respondents commented on issues which have not been dealt with in this Review, and which they felt need to be addressed and included in the final policy paper. These are summarised as follows:

9.1 TERMS OF REFERENCE

It was felt that the Terms of Reference of the Review had not been adequately followed through:

- Exploration of the relationship between the UK’s current approach to World Heritage, its wider strategic priorities and international goals and its commitment to UNESCO appears weak.
- The emphasis on the costs of WHS status takes precedence over the responsibilities. Consideration of the measures that might strengthen protection for WHSs is incomplete. Of the four Terms of Reference, only the fourth has been addressed unequivocally: “To recommend a policy on making future nominations for WHS status”.

9.2 UNESCO PHILOSOPHY AND POLICY

The following omissions were noted:

- lack of discussion (and therefore clarity) on the rights and responsibilities of the WH Convention;
- lack of any reaffirmation of the ideals of UNESCO’s WH mission in the Review paper;
- the Review quotes the Global Strategy in support of the current TL, but omits to mention the Gap Study.

9.3 OBLIGATIONS OF STATE PARTIES

- The obligation on the State Party to ensure the conservation of WHSs has not been addressed in the Review paper.

- No mention of climate change, its impacts, nor to mitigation and adaptation measures.
- The paper has not set out how other Government Departments, especially Defra, the Depts of Transport, Children, Schools and Families, and the Dept for Climate Change and Energy contribute to meeting the obligations on the State Party.

9.4 UK GOVERNMENT AND WORLD HERITAGE

- There is little about the relationship of use of the WH Convention to the UK's wider international goals, particularly in relation to UNESCO.
- There is lack of acknowledgement of wider departmental responsibilities for WHSs beyond planning and conservation.
- Reasons why UK policy has not coincided with that of other State Parties should have been addressed (UK policy having taken the UNESCO Global Strategy quite literally, as guidance).
- Links are needed to other Government programmes, including the potential of WHSs to deliver objectives of the Gov's sustainable communities programme, healthy living programme, etc.
- UK policy statements in relation to Article 5 of the 1972 Convention are lacking .
- No recommendations are made for actions to address the concerns of the WHC with regards to impacts of new development in urban areas.

9.5 NOMINATION

- Minimal space is given to natural sites, and none to nature in the "Aims" on p2.
- The Review document appears to be heavily weighted towards cultural aspects of WH.
- Questions for aspiring sites (5.7) should include "Is there widespread local public support for the site to be nominated?"
- The Review does not deal sufficiently with issues relevant to the UK OTs/CDs.

9.6 PROTECTION

- The section on protection of WHSs appears lightweight considering the threats that are evident at many Sites.

- There is no mention in the paper of the initiatives by CLG toward planning reform.
- The document makes no mention of protection in relation to climate change, its impacts, or mitigation and adaptation measures.
- The paper should build on draft measures already consulted on and not simply repeat them.
- The requirement for undertaking EIAs and the need for WHSs and their OUVs to be articulated in SEAs and SAAs needs to be stated.
- It is not clear how the Review will inform Regional Spatial Strategies.

9.7 MANAGEMENT

- The Review does not detail how the proposals to clarify lines of responsibility, provide a more joined-up approach, and provide a stronger WHS network, and enhance the website will be implemented
- A more joined-up approach to the management and interpretation of sites is evident in Scotland: this is not reflected in the Review paper.

9.8 FUNDING

- A number of the proposals in the Review will require additional resources, even if the Government does not proceed with a full review of the Tentative List. The Review does not suggest how additional resources should be provided for improved networks, national awareness raising and educational work or even an improved website portal.
- The Review gives no indication of how the Government will deliver its stated aim to ensure that resources are focused on supporting existing Sites as well as considering new ones. Statements about funding in 2.38 and 2.39 do not do justice to the problem of core funding for management of WHSs (particularly for complex sites) and are rather misleading. There is no dedicated central government funding and no requirement for local government to provide funding.
- 4.14 needs supplementary text on how appointment and funding of a full time WHS coordinator at all sites could be achieved and who would be responsible.
- Annex C provides outline advice on funding partners to aspiring Sites, but there is no such guidance for existing Sites.
- The Review gives no indication of how existing Sites will be supported to help the Government deliver one of their stated aims i.e. to ensure that resources are focused on supporting existing Sites as well as considering new ones.

9.9 PROMOTION, EDUCATION AND AWARENESS

- The Review comes to no conclusions and makes no recommendations in relation to promotion. It does refer to branding, but under “awareness raising”, and suggests unrealistically that individual Sites should be responsible for national action. The educational potential of WHSs is not adequately recognised in the documents.

PART 3: COMMENTARY ON RESPONSES (Sections 10-11)

10. ANALYSIS OF THE CONSULTATION

10.1 TYPE OF RESPONSE

There were 117 responses to the consultation.

Individuals

18 responses were from individuals, all but 4 of whom were promoting particular sites.

Organisations

- 36 gave their backing to Sites on the current TL
 - 19 proposed Sites for a new TL
- (NB There was a little overlap between these)

The terms of reference for the Review do not include the collection of nominations for the new TL.

54 organisations commented on the Review without using it to promote a particular Site or Sites, including 16 associated with inscribed UK World Heritage Sites.
i.e. approximately half of the respondents replied within the terms of reference of the Review.

Details of the types of responses can be found in Appendix 6.

10.2 SUPPORT FOR SITES

10.2.1 Sites on the current TL

The Lake District (25 responses in support) and Chatham Dockyard and its Defences (9 in support) have particularly strong and well organised lobbies, using briefing papers or standard letters. This might be expected of Sites which have gone some way in developing their applications for WH status, though it should be pointed out that support has also come from beyond the immediate lobby groups for those sites.

Most other Sites on the current Tentative List had little or no support: apart from the Flow Country (4 responses in support), no site on the current TL received more than 1 response in support.

It should be remembered however that opinions on which sites should go onto the new TL were not actually sought at this stage, and that the very high level of support for the Lake District and Chatham has been generated because of their particular positions as sites with well-advanced bids, and by the suggestion in the Review that they could have to reapply for a place on a new TL.

Further detail can be found in Appendix 7.

10.2.2 New Sites proposed for the Tentative List were:

Mainland United Kingdom

Machair and beaches of the Outer Hebrides

Chester Rows

Birmingham Jewellery Quarter

Portsmouth Harbour, Spithead and Isle of Wight

Letchworth Garden City

Joddrell Bank

Port Sunlight

Somerset Levels and Moors

“Dickens’ marshes”, to be included in Chatham Dockyard and its Defences

Pegwell Bay Ramsar site

York

Black Country and Birmingham Canals

The spiritual landscape of St. David’s Head

Parys Mountain copper mines

Arbroath Abbey

Overseas territories and Crown Dependencies

St. Helena

Chagos Archipelago Conservation Area

Grand Turk/Salt Cay

South Georgia

Transnational sites

Museum of London Docklands/ West Africa/ Bahamas

Cornish Mining transnational serial nomination

The international slate industry

10.3 USE OF THE REVIEW

10.3 1 Criteria for future applications

These are given in the Review as:

- Prima facie evidence of Outstanding Universal Value including authenticity and integrity
- Extent to which proposals meet the requirements of the global strategy and the gap studies

- **Whether the site falls into an under-represented category on the World Heritage List**
- **Extent to which site is subject to development pressures which might affect Outstanding Universal Value**
- **Extent to which there is international cooperation or linkages to be followed up actively**
- **Strong local consensus to pursue nomination**

(DCMS 2008 World Heritage for the Nation, para 5.8)

Responses were analysed to see to what degree the respondent had acknowledged the criteria laid out in the Review:

- **Most responses acknowledged the importance of OUV, and there was considerable discussion of the need to create a balanced List.**
- **Development was mentioned only occasionally as an issue.**
- **There was little take-up of the idea of international cooperation.**
- **Local consensus was also mentioned surprisingly little, though it should be pointed out that although it is given as one of the criteria for applications in 5.8, curiously, the Review did not offer this as a “Question for aspiring sites” i.e. is there widespread local public support for the site to be nominated? This is an omission that should be reconsidered.**

11. CONCLUSIONS

11.1 SITES ON THE CURRENT TENTATIVE LIST

Several Sites have already either been withdrawn, or have now become unviable because of the withdrawal of support by the landowner or a major stakeholder:

The National Park Authority for the New Forest have already decided not to pursue nomination;

The National Trust feels that Mount Stewart, North Norfolk and the New Forest are unlikely to want to go forward;

Network Rail has declared that it would not support the nomination of the Great Western Railway and the Forth Bridge;

Manchester, Trafford and Salford attracted several institutional opponents (and was the only Site to do so).

The key issue for the selection of Sites to be inscribed post 2011 is the very strong support for the retention of Sites currently on the TL which have already committed a large amount of time and resources in the preparation of bids. In particular, these are Chatham and the Lake District, although the Flow Country also garnered some support.

Chatham and the Lake District between them (and some responses cited both) gained support from approximately a quarter of the responses for the idea that their cases should be reviewed before the rest of the places on the new TL are filled. Some felt that they should have an automatic place on the List.

11.2 REVIEWING POLICY – OR RESPONSIBILITIES?

There are widespread calls for a review not just of WH policy within the UK Government, but of how WH issues are handled generally by the wider Government, and by whom.

Questions about nomination and inscription are dealt with thoughtfully and comprehensively within the responses. The greatest concerns were registered about the need for :

- the mapping of responsibilities for WH within all the Government ministries and departments;

- awareness raising with regard to responsibilities for WH within Government ministries and departments;

- **coordinated action between Government ministries and departments;**
- **centralised funding for WH protection, management and promotion, and**
- **statutory protection for WH Sites.**

There were calls both for improvement in the handling of WH by Local Authorities, and for financial support for them from central Government, given that responsibility for WH in the UK has largely been devolved to the level of local government. Specifically, respondents requested:

- **improved awareness of WH issues and responsibilities within Local Authorities;**
- **the creation of best practice guidance for Local Authorities;**

Within the UK WHS community, there was, similarly, strong support for:

- **the creation of best practice guidance for site managers, and**
- **sharing of experience and best practice through a single network.**

PART 4: APPENDICES

APPENDIX 1: FUTURE NOMINATIONS: CONSULTATION RESPONSES

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 for World Heritage Status?

1) Continue to nominate annually from our existing Tentative List;

2) Suspend new nominations for a period;

3) 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 (our preferred option); and/or

4) Consider alternative designations such as a National Heritage List or the European Heritage Label.

	Option 1	Option 2	Option 3	Option 4	Notes on Options	Future identification, nomination and designation policy
1	-	-	-	-	No option selected	
2	-	No	Yes	-	Option 3 supported subject to priority being given to sites which have already invested in developing a bid	- The UK should commit to inscribe all UK sites which exhibit OUV over an appropriate timeframe - Link between WH and Cultural Olympiad should be recognised by nominations in both 2011 and 2012
3	-	Yes	-	-	Option 2 is supported as a means to reconsider current TL sites over a 3 year	

					period because of the negative implications of inscription for development: sites “in aspic”	
4	-	-	Yes	Maybe		
5	-	-	-	-	No option selected	- WH needed in order to protect from loss
6	-	-	Yes	No		- Needs to address the diverse cultural heritage of the UK more:
7	-	-	-	-	No option selected	
8	-	-	-	-	No option selected	- Needed in order to produce tourism
9	-	-	-	-	No option selected	- Positive effect on management - Spur to commitment from local community
10	-	-	Yes	No		- Nomination process should be careful not to emphasise economic/ tourism benefit
11	-	No	Yes	No		- Global representation and types of sites are matters for UNESCO, not for individual state parties
12	No	No	Yes	No	<p>Option 2: To close off the opportunity for bids well advanced is not cost effective and would give little confidence in any further process for nomination.</p> <p>Option 3 supported, but if all sites have to reapply, this will not take into account the money and resources spent by sites preparing nominations and building WH awareness. This threatens to weaken public support and private sponsorship, and create more uncertainty about future nominations. The proposal makes no concession to the fact that the sites may already be fulfilling WH criteria.</p>	<p>- There are far too many sites on the List and a greater number wanting to be on it</p> <p>-Two phase application process is welcomed</p> <p>- Clearer guidelines as to which types of sites would be favoured are needed</p> <p>- Greater government engagement, liaison and support for favoured bids is needed</p>

13	-	Yes	Yes	-	<p>Option 2 supported, but only once all sites which demonstrate Outstanding Universal Value are nominated.</p> <p>Option 3 supported on condition that sites on the current TL which can evidence commitment to, and progress towards, a WHS application merit automatic entry to the next TL and should be prioritised for the next nomination opportunities.</p>	- Link between WH and Cultural Olympiad should be recognised by nominations in both 2011 and 2012
14	No	No	Yes	-	Ditto 12	Ditto 12
15	-	-	Yes	-	<p>Option 3 supported subject to there being recognition of the need to commit to progress the existing active, well advanced bid for the Lake District prior to forming a new list</p>	<p>- Concern about loss of many years of work and investment if sites have to reapply</p> <p>- Existing TL should be reviewed and all those sites actively working towards a nomination should be nominated under the current annual system.</p>
16	-	-	Yes	-	Ditto 12	Ditto 12
17	-	Yes	Yes	No	<p>Option 2: agree with the PWC report that there is a current trend to view WHS designations as a key to unlocking funding and as a tool for regeneration rather than one for protection and conservation, and it may be that a halt to applications would provide an opportunity to 'refresh' perceptions of WH listing.</p> <p>Option 3 supported as a future strategy, having stopped new nominations for a</p>	

					set period: meanwhile, the application process should be refined.	
18	-	-	Yes	Yes	Option 4 is attractive because already involved in European transnational initiatives	- TL nomination process should be much more transparent: periodic calls for nominations in which the public could be involved would be good publicity, and could involve public, private and voluntary sectors.
19	-	No	Yes	-	Ditto 13	- Consider that each potential site should be responsible for developing its own cost/benefit analysis. The process of preparing for nomination and inscription can generate real benefits in terms of place-making. Community pride and self-confidence.
20	-	No	Yes	Yes	Option 3 is supported as long as the TL is revised to take into account potential sites not currently included. Option 4 is supported as long as new designations do not undermine or cut across sites with WH status.	- UNESCO should not prioritise environmental heritage to the detriment of the rich built heritage of the UK. - Greater rigour needed in the UK in assessing built heritage, and focusing on clearly identifiable factors of historical significance
21	-	-	-	-	No option selected	
22	-	-	-	-	No option selected	
23	-	-	Yes	-	Option3: particularly welcome the idea of the two stage application process	- Nomination policy should take into account the work undertaken to produce the 1999 TL - Strongly support the idea that the public should be used to inform decisions on the scope and detail of future nominations
24	-	-	Yes	-	Option 3 supported with the caveat that existing WH Sites are better and more fairly resourced as a result of slowing	- Concern about loss of many years of work and investment if sites have to reapply: Chatham and the Lake District mentioned in particular.

					down inscription.	
25	-	No	-	-		- WH nomination (of Chatham) would help to bring alive history, and help to develop an understanding of the military ethos among young trainees and their parents.
26	No	-	Yes	-	Option 3 is supported as long as the TL is revised to take into account potential sites not currently included	- Nominations should take into account intangible heritage
27	-	-	Yes	-	Option 3 is supported as long as Chatham and the Lake District are subject to Stage 1 and 2 assessments as soon as results of the Review are announced.	
28	-	-	Yes	-		
29	-	No	Yes	Maybe	Option3: support a two stage application process, which would allow a broad range of sites to be put forward at the first stage. Option 4: more work is needed to establish the wider benefits of the proposals	
30	-	-	Yes	-	Option3: particularly welcome combination with a two stage application process, which would provide a “level playing field”	- An early decision on Stage 1 applications would provide some certainty for successful applicants before deciding to move forward.
31	-	-	Yes	-		- Change of UNESCO policy (towards landscape) should not be allowed to exclude recognition of the rich built heritage of countries like the UK, including their maritime and underwater heritage. - The UK was at the forefront of world technology

						<p>and to the extent that built heritage survives to express that legacy, it should be properly represented on the world List.</p> <p>- There should be greater rigour in assessing the quality of the built heritage and a specific</p> <p>- Believe that historic ships which are immovable and have become part of the built heritage, such as HMS Victory and Mary Rose are of undoubted world significance and should be recognised as part of the built heritage, and have the opportunity to be represented on the world list.</p>
32	-	-	Yes	Yes	Option 4: complementary to the WH process	- Importance of stakeholder engagement and partnership working in the build up to designation is key.
33	-	No	Yes	Yes?	<p>Option 2: to do this would be to lose the impact that the nomination process and status can have on the protection and conservation of heritage that is of at least national (if not international) importance.</p> <p>Option 3: a new TL could retain the key sites on the existing List</p> <p>Option 4: a National Heritage List or European Heritage Label could potentially be valuable tools.</p> <p>Potential problems: - complicating planning systems,</p>	- Feedback and guidance on the definition of OUV and Statement of Significance of a potential Site will be invaluable and cost effective before a full comparator assessment is undertaken.

					<p>confusing visitors and local communities - soaking up time and money if each accreditation had very different priorities and processes, and needed different documents and management plans.</p> <p>There would need to be an appropriate heritage body which understood the different designations, and could advise.</p>	
34	Yes	No	-	-	<p>Option 1: the UK government should commit to inscribing and supporting all UK sites (on the existing TL) which exhibit OUV. Sites which were added to the UK TL in 1999 were subject to extensive expert analysis and broad public consultation, and were selected in response to the Global Strategy.</p>	<p>Sites on the current TL which can immediately evidence - commitment to, and progress towards a WHS application - cultural, financial and benefits-driven underpinning of their nomination should be prioritised in the allocation of nomination dates.</p> <p>- In developing future TLs, OUV should be the principal driver.</p> <p>- Link between WH and Cultural Olympiad should be recognised by nominations in both 2011 and 2012</p>
35	No	No	Yes	No?	<p>Option 1: cost and inconsistency with WHC priorities precludes this option</p> <p>Option 2: too many worthwhile opportunities could be lost</p> <p>Option 4: no strong view. Within the context of natural sites, such as the Flow</p>	<p>- Would consider linkages with other sites supporting related interests.</p>

					Country, national and European designations already exist, and there may be little merit in what amounts to a parallel system.	
36	-	-	-	-	No option selected	
37	Yes?	No	-	-	Option 1 (?): the UK should continue to nominate WHSs. To cease nominations before all UK sites which have OUV have been recognised would undermine the UK's representation on the WH List, casting doubt on its integrity. Existing TL Sites that have publicly committed resources to an application should be prioritised for the earliest possible nomination dates.	- Nomination in either 2011 or 2012 would resonate with the aims of the Cultural Olympiad and provide a lasting legacy from London, Olympic Year.
38					Ditto 12	- The TL is stale and has not responded to changes in WHC priorities and criteria. Ditto 12 English Heritage resource should be focused on supporting a short TL and facilitating greater joint working between UK sites to aid the more cost-effective preparation of bids and help maximise benefits of inscription.
39	-	-	Yes	-	-	-
40	No	-	Yes	No?	Option 1: the 1999 TL was brought forward before the UNESCO WHC agreed its Global Strategy: therefore, this option is no longer realistic unless sites are	- The Secretary of State should publish a revised TL with an agreed programme of say five years to prepare and deliver the next tranche of nominations.

					<p>tested in the 2 stage process suggested by DCMS.</p> <p>Option 2: not acceptable as some sites have invested resources, time and effort into preparing a case for nomination</p> <p>Option 3: with following provisos</p> <ul style="list-style-type: none"> - the Secretary of State should examine first the sites presently included on the 1999 TL before considering new aspirants to be included on a revised TL. The selection of the 1999 TL was undertaken after a rigorous selection process and its findings have been found to be sufficiently robust that sites on this list should not need to reapply. - This can be in an adjusted two stage process and reconciled with the present context set by UNESCO <p>Option 4: alternative designations do not conflict with WHS designation, but if they require involvement and/or contributions from the Secretary of State, this could put additional pressures on the Department at the expense of work on WHSs.</p>	<p>- There is concern that having selected exceptional Sites following a review of the TL there remains a prospect that the nomination of these Sites might not be progressed for reasons related to the UNESCO Global Strategy. It is not entirely clear how this selection process will be related to other Government interests which have not been stated.</p>
41	-	-	-	-	No option selected	
42	-	-	-	-	No option selected	- Endorse the approach taken to involve IUCN in

						<p>the selection of natural sites, but think this process could be widened to include other applicable assessments such as the Millennium Ecosystem Assessment and other current thinking in valuing natural assets.</p> <ul style="list-style-type: none"> - There should perhaps be a prioritisation given to sites in the UK OTs and CDs to ensure a better geographical spread of sites. - There is a correlation between cultural diversity loss and biodiversity loss. WH has a dual function in preserving cultural and natural heritage, and prioritisation should be given to Sites that fulfil both needs explicitly. - Site designation should come from building on existing work and a bottom-up approach should be encouraged
43	No	-	Yes?	No	<p>Option 1: It is clear that the existing TL is near the end of its active life and that there are now only a few sites on it which have any chance of becoming WHSs and are still working to achieve this.</p> <p>Option 3: The UK should slow down the rate of nomination considerably: in England in particular there is a case for reducing the rate of nominations to perhaps one new site every ten years. This would allow focus on the better</p>	<ul style="list-style-type: none"> - There are still UK, OT and CD natural and cultural sites that merit inscription - There is strong potential in areas such as the heritage of science and technology, and natural sites in OTs. - Future nominations must be set in wider WHC policy contexts - Slowing down the rate of nominations would not diminish overall support for the Convention and its objectives since effective management of our

					<p>management and protection of the existing 17 WHSs. Delay may also make clearer the true gaps within the existing WH List which might be filled from within England in the future.</p> <p>There may need to be some transitional arrangement for handling those sites on the current TL whose preparations are well advanced.</p> <p>Option 4: - issues of workload apply, probably comparable to nominating WHSs - it would take some time for the alternative to gain prestige - an international scheme could have similar implications to WH.</p>	<p>own sites and working with UNESCO and others to improve approaches to WH may well be more significant contributions to the well-being of the Convention than just adding yet more sites to the List</p>
44	-	-	Yes	No	<p>Option 3: thought should be given to those sites which have already invested a great deal of money into preparing their bids, and whether they could be compensated in some way if they were removed from the current TL.</p> <p>Option 4: could provide compensation (see above) but runs the risk of confusing the public.</p>	
45	-	-	Yes	Yes?	<p>Option 4: would support the application of the European Landscape Convention to relevant areas of the UK</p>	<p>- Should any existing TL candidate sites lose their place as a result of the Review, the Government is urged to maintain an ongoing dialogue with and support for their managing organisations so that</p>

						the enthusiasm and momentum built as they assembled their case for nomination is not lost.
46	Yes	No	-	-	<p>Option 1: to remove sites from the long-established (1999) TL (as proposed by the Review) would detract from the outstanding community impact which has been, and can be, achieved by this external corroboration of outstanding significance. Further, it would threaten and undermine progress to date in promoting significance of our heritage, and set a worrying precedent for sites included in future TLs, who will need to secure stakeholder commitment to nomination work.</p> <p>Option 2: to cease nominations before all Britain's sites of OUV have been added to the List would detract from the quality of the List, and serve to incompletely represent Britain's contribution to the world we know today.</p>	
47	No				<p>Option 1: unsustainable beyond the next few years, and will bring the system into disrepute by over-nominating UK sites.</p> <p>Option 2: might have a beneficial effect in demonstrating the UK's seriousness in addressing imbalances in the List: should be for no more than 5 years, and should be used to develop possible nominations and a sound TL.</p>	<p>- The process of creating a new TL should be open and transparent</p> <p>- The number or frequency of nominations should not be prejudged until a new TL has been completed</p> <p>- Ample time should be allowed for lead partners to be found and proposals developed before the TL is closed</p>

					<p>Option 3: supported - short, specified moratorium period</p>	<p>- Advice and mentoring may be needed to help applicants develop proposals</p> <p>Opportunities for trans-national Sites and extending existing Sites should be considered, bit to increase UK benefits, and assist other nations</p> <p>- Likely benefits of WH status should be considered before nominations join the TL</p>
48	-	-	-	-	Duplication – See 75	Duplication – See 75
49	-	-	Yes	-	<p>Option 3: in return for slowing up inscription and to ensure that the benefits of WH status are optimised, resources should be restructured and systematised, and central funding made available for national promotion.</p> <p>Option 4: a National Heritage List, if it included WHSs and TL Sites and if all Sites on the List had national protection, could help to clarify the status of WHSs, through giving them national status, and provide for TL Sites a stepping stone towards WHS inscription. We do not however consider that such a national list could or should be seen to supplant nominations for WH status.</p>	<p>- The suggestion to suspend one List and leave a 2-year gap before the next List becomes effective is unworkable for some Sites: it would have the effect of putting “in limbo” Sites where active work is being undertaken between now and the finalisation on the new TL.</p> <p>- The two-stage process should be modified through the introduction of a fast-track option for well-advanced TL sites as soon as an announcement has been made on WH policy, in order not to send out demoralising and destabilising messages, or waste considerable public money.</p>
50	No	No	Yes	Yes	Option 1: not supported, as periodic review should allow for removal of Sites	- Would encourage the Government to consider a thematic approach in drawing up the new TL,

					<p>from the TL</p> <p>Option 2: laudable, but unlikely to be an example followed by member states</p> <p>Option 3: reflects both the need to address the global imbalance and provides an opportunity to contribute to UNESCO's and the UK's Government aims. For example, funding released by periodic nominations rather than annual ones could be used to help developing countries. (eg Hadrian's Wall and other parts of the FRE)</p> <p>The UK should slow down the rate of nomination considerably, to no more than one in 3-4 years: in England in particular there is a case for reducing the rate of nominations to perhaps one new site every 10 years.</p> <p>Option 4: would welcome exploration of the European Heritage label which would be consistent with the protection of cultural heritage assets at a European level in line with the protection of natural habitats.</p> <p>Do not support the introduction of a new National Heritage List.</p>	<p>perhaps focusing on science and technology, on natural sites in its OTs and on the continuing development of transboundary nominations.</p> <p>- Slowing the rate of nomination would not diminish the UK's overall support for the Convention, but might enhance it.</p> <p>- A flexible timetable for nominations should be considered</p>
51	No	-	Yes	No	Option 2: if the current designation rate	

					<p>continues, it is likely the value of existing WHSs could decline.</p> <p>Option 3: The number of UK heritage sites meeting the criteria of OUV is finite; therefore it is appropriate that nominations should slow.</p> <p>Option 4: at odds with the Government's commitment to simplify the heritage protection system.</p>	
52	-	-	Yes	-		<p>- Strongly recommend that all sites considered to be of OUV should appear on the List, even if immediate addition to the WH List itself is not possible for pragmatic reasons.</p> <p>- To redress existing imbalance, strongly recommend that preference be given to natural sites including sites in the OTs in prioritising sites for proposal for designation to the WH List.</p> <p>- Recommend that additional sites of OUV, not on the current (indicative) IUCN list because they are not in priority 'biomes' could nevertheless be added to the TL.</p> <p>- To avoid candidates losing their interest before listing, recommend that sites on the TL should be treated by the UK as if they were already WHSs.</p>
53	No	No	Yes	No	Ditto 12	Ditto 12
54	-	-	Yes	-	-	-

55	-	-	Yes	-	-	-
56	-	-	Yes?	Yes?	<p>Option 3: the UK should only reduce to nomination every other year if other European countries (especially those which have more sites than Britain already) do the same.</p> <p>Option 4: the European Heritage Label could be a useful publicity tool in encouraging tourism.</p> <p>Do not support the National Heritage list, which could add to the confusion of forms of protection already existing.</p>	<p>- More thought should be given to overall planning and direction for WHS submissions. The present system of leaving it to pressure groups to come up with suggestions inevitably encourages the better organised and more experienced, but does not necessarily lead to a good balance of proposals. In particular, unfashionable topics (e.g. Bazalgette's sewage system) may lack advocacy and the necessary finances. Possibly a committee to consider the gaps in current nominations would be very useful in all areas, not just industrial history, and the Committee should have funds to encourage new submissions.</p>
57	-	No	Yes	-	-	<p>- Understand that there is a desire to eliminate the suggestion of ethnocentrism implicit in the List's preponderance of Western (and indeed Christian) sites. However, many ecclesiastical sites can also have a greater value and significance than their nomenclature as religious sites would suggest. Eg Arbroath Abbey, the place of the signing of the Declaration of Scottish Independence, which played a pivotal role in the creation of democratic thought in Europe. DCMS should resist any limitation of eligible sites based on such a fundamental category error.</p> <p>- There is an opportunity to develop links with the international community and allow the linking of sites that demonstrate the development of democracy in Europe and other areas of the world: an excellent counterpoint to the more</p>

						<p>militaristic and colonial monuments that often appear on the lists.</p> <p>- Should be thinking holistically of how to link sites within the UK and around the world to create communities of ideas and connections between the communities where these ideas began to take root and how they developed in other areas.</p> <p>- There should be no specific timeframe for nomination: this should be based on the sites themselves</p>
58	-	-	Yes	No	<p>Option 3: phasing bids will strengthen the individual bids and maximise the value of WH status.</p> <p>Option 4: no real evidence that there would be any additional benefit. The unified Register of Heritage Assets proposed in the Heritage Protection Bill and the proposed national designation system would be more useful.</p> <p>DCMS position of waiting to see what happens with the European Heritage Label before committing one way or another seems prudent.</p>	<p>- The consultation process carried out by prospective Sites should be clearly demonstrated to have been fully inclusive.</p>
59	-	-	Yes	No	<p>Option 3: would also wish to support colleagues within other areas who are currently on the TL and have committed substantial public resources and work towards nomination.</p>	<p>- Support the need to reconsider the nomination process to ensure that the concept of WH is not devalued by too many nominations.</p> <p>- The process should continue to be reviewed, and</p>

					<p>Some kind of fast track process could be considered for those sites which are currently well through the nomination process.</p> <p>Efforts should then be focused on existing WHSs, promoting improved management and funding.</p> <p>Option 4: not supported as the existing system is well understood</p>	<p>new nominations allowed, as perceptions of heritage change.</p>
60	No	-	Yes		<p>Option 3: any slowing of the process of nomination should be accompanied by a greater national coordinated commitment and provision of funding to assist in meeting the obligations of the Convention at existing Sites.</p>	<p>- The existing TL should be reviewed as a priority before new proposals are considered. The results of the 1999 selection process should be taken into account. Those sites which passed this and are sufficiently well-advanced in the process of nomination should not have to pursue that 2 year review process, which might diminish local support.</p> <p>- Any early self-selection built into the process will only be successful if adequate assistance is provided in translating the OUV criteria into an accessibly illustrated checklist.</p> <p>- It may be necessary to provide further case studies related to expense such as costs for meeting the obligations of the WH Convention.</p>
61	-	-	Yes	No	Option 3: ditto 12	<p>- Agree that the TL needs to be reviewed to ensure that changing values are reflected in line with WH</p>

						<p>criteria, including local values reflecting the UK's diverse heritage.</p> <ul style="list-style-type: none"> - DCMS should carry out an internal review of existing TL sites: this will reveal that only a few are working towards nomination. This Review could put forward those sites, and open the rest to applications. - Selection should be UK wide and transparent. - Concerned that the report does not suggest Terms of Reference for the TK Committee. The Committee should develop an independent overview of potential WHSs in the UK against rigorous and inclusive academic criteria, as well as publishing guidance on criteria and application procedures.
62	No	No	Yes	No	<p>Option 3: Ditto 61 Streamlining the process is very welcome, as prospective sites currently embark on the process with considerable uncertainty until late in process as to whether their bid has DCMS support, and when it will go forward for nomination.</p> <p>Option 4 not supported because further designations could confuse, duplicate and potentially undermine existing designations.</p>	<ul style="list-style-type: none"> - Existing TL sites should be given the opportunity to demonstrate that they already fulfil the criteria in the proposed two stage application process, in advance of formulating the new TL. Successful sites would automatically be on the new List, this maintaining momentum, sustaining public confidence and protecting the significant investment already committed. - Clearer guidelines as to which types of sites will be favoured, and greater Government engagement, liaison and support for favoured bids is important.
63	-	Yes (or..)	Yes	No	<p>Option 2: Would in fact prefer all</p>	-

					<p>operational railway assets to be removed from the TL permanently. There are already strong protection controls in place through listing.</p> <p>Option 3: If this is chosen, feel that as the Great Western Railway and the Forth Bridge are on the TL, 63 should be part of the Steering/Advisory Group for this Review.</p> <p>Option 4: Satisfactory alternative designations already in place. (listing)</p>	
64	-	-	-	-	No option selected	-
65	-	-	Yes	No		<p>- It is noted that UNESCO's encouragement for nominations related to natural or non-European sites make it less likely that further European cultural sites will be inscribed. England and Wales already have a national heritage system and do not need an additional scheme at a national level to compensate for changing UNESCO priorities in WHS inscriptions.</p>
66	Yes?	No	No	-	- Option 1? More nominations, not less, should be made. Interest in WH status is increasing and any changes in selection of potential sites should reflect this.	
67	-	-	Yes	No?	- Option 4: current "National" and "European" designations provide a useful hierarchy of designations, but none would be worthwhile if they were not suitably protected, publicised and	"Cost/benefit" is not the way to look at nominations: the critical issue is a cultural one; whether the history/story of each site is worthy of preservation for future generations.

					funded.	
68	-	-	Yes	Yes	<p>- Option 3: proposers of current TL bids should be asked to review their bids</p> <p>- Option 4: support the European Heritage label: this would give focus and wider significance to sites that are unlikely to become WHS but for which there is a local determination to management under international heritage best practise.</p>	<p>- The government should not change the current system for the devolved administrations, in which candidates for the TL are nominated by First Ministers. This system is more likely to redress the disproportionate number of inscriptions in England.</p> <p>- It would be inappropriate for the selection process to be chaired by English Heritage: this would work against the democratic arrangement currently in place. The process should be overseen by DCMS through an independent and/or UK-wide chair, and EH should join Historic Scotland and CADW as national advisors on the panel.</p> <p>- Criteria for designation should be given wide publicity as part of updated guidance</p> <p>- WHSs should be inscribed for their heritage value, and not for their potential for regeneration.</p>
69	-	-	Yes	-	<p>Option 3: concern about the provisional timetable. 4 months provided for successful Stage 2 candidates is relatively short compared to the 6 months suggested for analysis of Stage 1 applications.</p>	<p>- Not clear how the TL would be maintained: could new nominations be put forward at any time, or would they have to tender/retender every 5 or 10 years?</p> <p>- Further consideration is needed about membership of the Committee, to ensure that natural and cultural interests are balanced, and to ensure a better balance between devolved administrations.</p>

						<ul style="list-style-type: none"> - A further assessment stage would be useful, to allow consideration of a national perspective on sites. - Consider a provisional limit to the number of future UK nominations, in which case, how should remaining nominations be allocated? - Consider reviewing existing sites to create space for one which may now be more deserving? - The Review paper concentrates on cultural sites, even though the WHC is concerned over the lack of natural sites; joint sites seem to have been overlooked, and there is less support for natural sites. This needs further discussion.
70	-	-	Yes	No	<p>Option 3 supported, but sites on the current tentative list which have invested significantly into the preparation of their bids and which can demonstrably prove their OUV should be given priority for submission after 2011, in advance of the streamlined two stage application process coming into effect.</p> <p>Option 4 not supported: the more designations locations aspire to, the more confusing it becomes to the general public and the more potential for duplication and complication. Unless the designation brings about extra protection or funding, it would seem an unnecessary</p>	<ul style="list-style-type: none"> - Clear guidelines should be produced to help prospective Sites to make the decision whether to enter the first stage of the application process - If a Site is able to demonstrate OUV, it should not be discouraged from applying, irrespective of overall numbers and types of WH Sites: we should be proud of having WH Sites, not embarrassed by our ranking as 7th in the world. - Endorse the idea that future nominations should consider international linkages where appropriate and feasible. - Current Sites should have the opportunity to consider bilateral agreements (including with TL

					step.	Sites in the developing world). DFID could support the use of British expertise in heritage management for specific developing countries' WH Sites that need support and for which there are obvious benefits for livelihoods. Such support might be facilitated by an organisation such as VSO.
71	-	-	-	-	No option selected	- Inscription should include strong commitments from the UK Government to properly resource and manage these internationally recognised assets.
72	-	-	Yes	Yes	Option 3 supported, but needs to be handled with care, particularly with respect to sites already on the TL. Option 4 is seen as complementary to Option 3. This would provide opportunities for aspirants to develop proposals for an appropriate heritage status, and would perhaps allow movement upwards (and downwards). It would clarify for consumers the sense of what is important.	
73	-	Maybe	Yes	No	Option 2 a possibility in the short term. Option 4: The existing heritage designations are embedded in the planning framework and can be assessed against broader economic, social and environmental objectives. For this reason, do not support the creation of a new national or European heritage listing process.	- It should be a requirement that all proposals are subject to a thorough cost/benefit analysis for the Site and surrounding area to ensure that the impact of WH status on broader social and economic objectives is fully understood.

74	-	-	Yes	-		
75			Yes		<p>Option 3: Stage 1 of selection must focus on OUV. All other factors must be secondary. This should save unsuitable candidates from wasting time and resources.</p> <p>The Stage 1 and 2 timetable is too short: DCMS must ensure that time is available to provide candidates with information and support.</p>	<p>- It must be made clearer, especially to potential candidates, that WHSs are selected for their OUV, and that this is the primary purpose of site designation. Motivations such as development threats, local support, economic advantages, and tourism, are all subordinate.</p> <p>- There should be more integrated working between parties involved to redress the balance between cultural and natural Sites in the UK.</p>
76	-	-	Yes	No	<p>Option4: National heritage is already recognised through a system of listing, designation and registration: alternative designations are unnecessary and potentially confusing.</p>	<p>- Given government involvement in the WHS nomination process, sites selected for the TL should receive funding to cover the costs of developing a management plan.</p> <p>- Frequency of site nomination should not be pre-determined, but should be based on the readiness of management plans and funding. If a Site is considered to have OUV, there should then be no reasons for delaying nomination.</p> <p>- Creation of the new TL should be done in conjunction with other nations to ensure that the best examples of heritage of international significance are put forward.</p>
77	-	-	Yes	Yes		
78	-	-	-	-	<p>No option selected</p>	<p>- Important to reflect the priorities of the WHC and work with them to ensure that nominations continue to make a positive contribution to the growth of the WHS series.</p>

						<p>- The current WHS list in the UK is focused on the historic environment: there should be a more integrated approach between this and the biodiversity, geodiversity and wider landscape elements of WH Sites.</p> <p>- the UK should consider geology and geomorphology in relation to existing and potentials WHSs</p> <p>- Natural England should be consulted on the future development of any TL, and consideration or adoption of alternative designations.</p>
79	-	-	Yes	No?	<p>Option 3: will avoid weaker candidates being put forward.</p> <p>Option 4: it is important to consider the existing UK designation options such as National Parks, which already require the partnerships and management plans which are likely to achieve a lot of the benefits of WH Site status.</p>	<p>The application process should take into account the fact that sites from the previous TL have had a decade to make their case, but failed to be put forward. The process should therefore look more favourably on new applications which have not previously been given the chance to make their case.</p> <p>The biannual system of nominations proposed is too rigid: sites may either be forced into an early slot before ready, or have to wait years after nomination work has been completed. It also gives the advantage in 2012 to sites from the previous TL. Years of nomination should not be specified in advance.</p>
80	-	-	-	-	No option selected	
81	No	No	Yes	No	Option 4: would complicate the heritage protection system	- At the first stage, applicants should be asked to show that designation would be likely to produce

						substantive net public benefits, based on the experience of already inscribed WHSs as set out in the findings of the PWC study.
82	-	-	Yes		Option 3: if fewer nominations for WHSs are made, there need to be specific proposals to enhance resources for existing WHSs to reflect a redistribution of funding.	- Supported as long as inscription is based on eligibility according to UNESCO criteria, rather than on a cost/benefit analysis.
83	-	-	Yes	-	<p>Option 3: there needs to be clarity about the level of detail needed at Stage 1 of application. If additional detail may be asked for at this stage, there does not appear to be time in the proposed timetable.</p> <p>There should be more than one opportunity within the next 3 years to make a submission at Stage 1.</p> <p>If the timetable stays as it is, it appears that it is targeted at bids on the current TL. 2 months for Stage 1 is too short a period for sites beginning from a standing start: would suggest 3-4 months, with a second opportunity to make a Stage 1 submission before 2012.</p> <p>Sites which get through to Stage 2 should have greater assurance that they will make it onto the TL.</p>	<p>Welcome the statement about criteria which will be expected by DCMS</p> <p>Where the UK can</p> <ul style="list-style-type: none"> - provide sites that are in under-represented categories - create transnational sites with underdeveloped countries - can put forward exemplar sites <p>there may be situations where the UK may wish to put forward more than one site in a year or put forward sites in successive years.</p> <p>The new TL should be an active list that is kept under review. Sites that show limited progress or are unable to meet set criteria and timelines should be removed on either an annual or biannual basis.</p> <p>DCMS and partners in the devolved nations should produce clear guidance on the process, and work more closely with Local Authorities and site owners of both existing and proposed WHSs.</p>

						<p>WH Forums are needed in each of the devolved nations and England, and these should liaise through a UK-based forum.</p> <p>If potential sites should first whether they can ensure that basic funding for coordination costs is secured, this needs to be included in the questions and be made visible as a key criteria to be considered before completing a Stage 1 application.</p>
84	-	-	Yes?	No?	<p>Option 3?: the Government should space out nominations so that a new WHS is not necessarily nominated each year.</p> <p>Option 4: although there is some support for the idea of a National Heritage list, it is thought that sites or places in such a category might be included within the lists of Heritage Assets proposed under the Heritage Protection Bill.</p>	<p>- WHSs ought to be nominated for their OUV alone and not, as appears to be a growing trend, for the potential economic or other benefits they may bring to States party to the World Heritage Convention.</p> <p>- Large numbers of visitors, often seen as an economic benefit, can lead to the degradation of WHSs. There should be specific and realistic guidance to potential WHS proposers.</p>
85	No	No	Yes	Yes	<p>Option 3: the duty of care to sites that have most actively developed their bids needs to be honoured first. These sites should be nominated on an annual basis. Other sites should be offered the option to withdraw from further consideration or to compete on equal terms with new candidates as part of an open consultative review.</p> <p>Option 4: there should be a new national designation that protects historic towns</p>	<p>- The Government should focus on the primary conditions of OUV, authenticity and integrity, adopt a more creative approach, and coordinate its interpretation of the Global Strategy with other state parties, especially across Europe.</p> <p>- There should be coordination of the 2011 UK TL with those of other European State Parties.</p> <p>- A more creative approach should be considered towards possible serial nominations either within or between State Parties</p>

					and cities holistically.	<p>- The UK should sign up to the 2003 UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage, and consider nominations under that Convention.</p> <p>- Tourism benefits are not anticipated in the WHC and should not be a determining factor in candidature for the TL.</p>
86	-	-	Yes	Yes?	<p>Option 4: this would run counter to the aims and objectives of heritage protection reform which aims to simplify and unify the current heritage protection system in England and Wales.</p> <p>Option 4: Would welcome Government investigation and development of a European scale of heritage designation: the lack of this sometimes disadvantages cultural heritage considerations in relation to the natural heritage.</p>	<p>- Would welcome a strategy to encourage UK nominations to represent live cultural traditions (particularly ones that reflect 20th century cultural history and popular culture) which have shaped places in ways that have international significance and influence.</p>
87	No	No	Yes	No	<p>Option 2: unnecessary and unreasonable</p> <p>Option 3: recommend the spacing of nominations to suit the needs and capabilities of aspiring sites rather than to fit a rigid governmental timetable. The two stage application process by which informal advice is given to aspiring sites on their realistic chances of success has long been a reality, but the suggestion that this process is made more formal</p>	<p>- UK WH and TLs should contribute by ensuring that they comprise the most outstanding sites representative of the special contribution of the UK to world culture and heritage. This best achieved by the continued process of scrutiny leading to the nomination of outstanding sites, especially those which are under-represented in their type or date.</p> <p>- The UK and its Overseas Territories and Crown Dependencies still hold sites worthy of inscription,</p>

					<p>and transparent is to be welcomed.</p> <p>Option 4: alternative designations such as the National Heritage List or European Heritage Label do not appear to be true alternatives to WH inscription. They would presumably have to conform to a different set of criteria to reflect the political framework within which they were devised. The desirability of such designations, which would inevitably have their own discrete costs and benefits, should be examined in their own right rather than as alternatives to WH inscription.</p>	<p>particularly in the under-represented fields of science and technology, as well as some areas identified in the Gap Study.</p>
88	-	-	Yes	-		<p>- Extremely useful to have certainty about the programme of future nominations, as this avoids unnecessary competition between sites and the premature production of supporting information in advance of their submission to UNESCO.</p>
89	Yes	-	No	Yes	<p>Option 1: The current TL is of value: there are many valuable sites listed, and they include many sites of an industrial nature which conforms to UNESCO criteria. Any proposals to reduce the list by introducing more restrictive criteria should be amended to apply to new nominations. The existing Sites should go forward annually for nomination if their proponents still want to support it.</p> <p>Option 3: places too many hurdles in the</p>	<p>A reduction in additions to the list could be brought about by a screening process, but not as bureaucratic as that proposed.</p>

					<p>way of proposals for WH status.</p> <p>Option 4: would favour making greater use of the European Heritage Label as we are clearly part of the European continent, and the UK is under-represented. Such status only enhances the importance of a site and is not really duplication as nature sites already benefit from European and UK protection.</p>	
90	No	No	Yes?		<p>Option 1: the industrial sites included in the 1999 TL were conceived as a coherent group, and those outstanding should not be discarded lightly.</p> <p>Option 2: there is “...no sound rationale” behind the statement that additional sites will ‘devalue’ the brand and dilute the perceived significance of existing WHSs: the UK “has been innovative in pushing the boundaries for inscription”. “Intellectual rigour” needs to be applied to the debate.</p> <p>Government should commit itself to publishing a new list, based on its acceptance that there are further worthwhile candidates .</p> <p>Option 3: Government should review each of the outstanding sites (on the TL)</p>	<p>The Government should clarify the system of nomination: this should involve setting out:</p> <ul style="list-style-type: none"> - how the consultation and selection processes will work - the role of the various agencies, statutory and non- statutory <p>- Any outcomes should be based on a strategic approach founded on sound and clearly set out principles rather than expediency.</p>

					in open consultation, nationally and locally, and discard those that have no chance of success.	
91	No	No	Yes	-	Option 3: hope that annual nominations might still be possible	<p>- Should recognise the rich heritage of countries like the UK, including their maritime and underwater heritage, both natural and influenced by human agency.</p> <p>- The UK's place at the forefront of innovation in technology should be properly represented, and to the extent that built heritage survives to express that legacy, it should be properly represented.</p> <p>- Would welcome a greater in assessing the quality of built heritage</p> <p>- Believe that historic ships which are immovable, such as HMS Victory, HMS Warrior 1860 and Mary Rose are of undoubted world significance and should be recognised as part of the built heritage, and have the opportunity to be represented on the world list.</p>
92	-	-	-	-	No option selected	
93	-	-	Yes	No	<p>Option 3: favour spacing out nominations. It is unlikely that there are enough sites that are truly outstandingly universally significant for an annual nomination from the UK to continue.</p> <p>Slowing down the bid process will give all time to adjust to the changes in approach</p>	<p>- The decision to apply for inscription needs to be based on the understanding that a site's owners/direct stakeholders need to have the resources to manage a site, or the ability or willingness to garner financial support for this purpose.</p> <p>- Increased awareness of the responsibility that</p>

					<p>to inscription and representation within UNESCO.</p> <p>Option 4: the present national grading system is sufficient. A European Heritage Label could be read as “not quite WHS standard” or even a failed WHS, especially if the establishing criteria are not well-defined.</p>	<p>WHS status entails (and the dearth of associated support) combined with a more spaced-out policy of proposing sites, could perhaps make consensus about the OUV of a Site the driving force behind its nomination.</p>
94	-	Yes	-	Yes	<p>Option 2: consider that the nomination of too many WHSs tends to diminish the value of those already inscribed.</p> <p>Option 4: designations of alternatives might provide potential sites for nomination as WHSs at a later stage.</p>	<p>- WHSs should be nominated and preserved for their intrinsic value to the whole of mankind, not because they are seen by States party to the Convention to be a source of civic pride and/or economic return.</p> <p>- Nominations should not be made on the basis of potential income, not avoided because of any potential drain on financial or other resources. The Convention allows for assistance with conservation etc of WHSs should a state party be unable to look after its WHSs satisfactorily.</p> <p>- Unless the Government has the means for and is fully committed to protection and rehabilitation of its existing WHSs, there is little point in nominating more Sites on land. (Offshore the situation is rather different)</p> <p>- Would welcome wider consultation amongst those concerned, including local residents and amenity societies, on the nomination of WHSs.</p>

95	No	No	Yes	No	<p>Option 2: a blunt approach. To close off the opportunity for bids, especially those which are well founded and advanced is not cost effective and would give little confidence in any further process for nomination.</p> <p>Option 3: ditto 12 Option 4: ditto 62</p>	<p>- Streamlining the application progress (sic) but making it more evidence-based as to the likely added values would be welcomed.</p> <p>- There should be greater joint working between UK Sites and other “like” Sites to aid the preparation of bids</p>
96	-	-	-	-	No option selected	
97	-	-	Yes	-		<p>- Concerned that having more WHSs will increase bureaucracy, making development and natural change more difficult: for example would the City of London or Canary Wharf have been able to develop as they have if the Square Mile or Docklands had been designated as WHSs – and what would the consequences have been for Britain’s economy?</p> <p>- Particularly concerned that there appear to be no procedures for cancellation of designation in the future if circumstances change</p>
98	-	-	-	-	No option selected	<p>- There is a need for absolute value in selecting sites if the WH List is to retain its significance. If of OUV, sites should be acknowledged as worthy in their own right for this accolade of WH status and not rejected because there are already too many cultural, too many in Western Europe, too many of a particular type..... seemingly similar aspiring sites can have very different claims to OUV.</p>
99	-	-	Yes	-	Option 3: protect and progress viable	<p>- Unless considerable new resources are</p>

					current nominations which have involved significant public funding and support from government agencies in any transition to a new process.	employed, support slowing down the adoption of new Sites in order to prevent existing resources from being diluted.
100	-	-	Yes	No	<p>Option 3: seems to be the best fit with current UNESCO policy, should help to avoid raising unrealistic expectations and reduce nugatory effort on the part of potential candidate sites, and minimizes the risk of diluting the WHS 'brand'.</p> <p>Option 4: benefits of 'second tier' designation are highly unlikely to outweigh the costs of the additional bureaucracy involved.</p>	
101	-	-	Yes	-	Option 3: would like the TL to be reviewed rather than purged. Forcing already advanced bids to reapply would incur unnecessary expense and work and dent public confidence and private sector support.	
102	-	-	Yes	No	<p>Option 3: with the following provisos:</p> <ul style="list-style-type: none"> -the 1999 TL provided an important benchmark for assessing Britain's contribution to world development and should not be lightly set aside. - the requirements of any new regime should be fair and proportionate and avoid the duplication of earlier work and the imposition of onerous burdens upon 	

					<p>sites already identified in the existing TL.</p> <p>Option 4: not supported because</p> <ul style="list-style-type: none"> - it runs contrary to the objective of creating a single system for national designation - it could undermine protection for sites of only national significance - the European Heritage Label could reinforce the predominance of European sites 	
103	-	-	Yes	No	<p>Option 3: support this with the proviso that sites identified on the current TL are dealt with fairly, both procedurally and substantively.</p> <p>Option 4: a National Heritage List is not supported because</p> <ul style="list-style-type: none"> - it runs contrary to the objective of creating a single system for national designation - it could undermine protection for sites of only national significance <p>The European Heritage Label could provide recognition and protection on an international level for heritage sites not qualifying for WH status, and may also provide greater parity at a European level with the protection of natural</p>	

					assets.	
104	-	-	Yes	-	<p>Option 3: urge DCMS to consider retaining the most active, relevant and well-advanced bids on the TL. To wipe the slate clean would be to ignore the wide variation in the level of progress achieved by each bid. It could also undermine progress, add to costs, and create uncertainty about the prospects for future nomination.</p> <p>Existing well advanced bids should be progressed prior to forming a new TL.</p>	Ditto 38
105	-	-	Yes	-	<p>Option 3: supported, but in the hope that this approach will genuinely lead to more focus on resourcing the management of existing Sites on the List.</p>	
106	-	-	Yes	Yes	<p>Option 3: will enable future nominations to reflect the UK's diverse heritage and changing values.</p>	<p>- Despite being turned down (for the 1999 TL), the process of applying and therefore promoting the site as a significant heritage asset resulted in increased support.</p>
107	-	-	-	Yes	<p>Option 4: there is a strong case for HMG providing greater support to UKOTs/CDs wishing to adopt some system of alternative designation, tailored to the particular needs to the territories.</p>	<p>The arrangement by which potential WHSs in the UKOTs and CDs are nominated under the UK Tentative List is in some respects problematic:</p> <p>- there is pressure for the UK as a 'well-represented' state to slow its applications, but ,most UKOTs are not located in Europe and WHSs in the Territories do/would not therefore contribute to the geographic imbalance in the List.</p>

						<ul style="list-style-type: none"> - Under different circumstances, the UKOTs/CDs might reasonable be regarded as ‘countries whose heritage is under-represented on the WH List’ (para 5.9) - Cultural priorities identified for the UK do not necessarily translate well to the UKOTs. - Cultural and natural heritage in the UKOTs/CDs is highly distinctive from the UK norm, particularly in biodiversity - The often unique natural heritage is under considerable threat - There is little local capacity for protection, and cultural heritage often has the least
108	No	No	Yes	-	<p>Option 1: this would exacerbate geographical imbalance</p> <p>Option 2: would lead to a gradual disengagement with the WH process and deny opportunities to potential sites.</p>	<ul style="list-style-type: none"> - There is a need for rigorous comparative analysis to justify international status - Future nominations should be strongly influenced by the thematic approach adopted by UNESCO - The UK has very limited potential to make a successful case for new natural WHSs, and these only exist in the OTs: the UK should concentrate on these for future natural site nominations. Very important to manage the expectations of proponents of new nominations: <ul style="list-style-type: none"> - inscription may increase tourist numbers and aid regeneration, but this is not its purpose. - the Convention cannot be seen as a mechanism to protect all sites of national or even international interest

						<ul style="list-style-type: none"> - costs of carrying forward a nomination are high and there is a high risk of failure - Would favour combining applications with those of other State Parties where possible
109	-	-	Yes	-	Option 3: a sensible and pragmatic approach, and a more transparent and rigorous process	<ul style="list-style-type: none"> - Although all potential sites should be subject to the same selection criteria, there may be merit in splitting both the application process and the TL itself to provide clear and separate opportunities for CDs and OTs to take part without being placed in direct competition with UK interests. - The UK should cooperate with neighbouring and historically connected State Parties to the maximum degree possible to ensure that the opportunities for transboundary and serial transboundary nominations are fully explored. - The UK should consider proposing to the WHC that transboundary nominations should be considered outside of the normal maximum annual limit for nominations from a State Party. - Aspiring sites would benefit from having access to the management plans and promotional strategies of existing WHSs.
110	-	-	Yes	-	Option 3: ditto 101	
111	-	-	Yes	-	Option 3: ditto 101	
112	-	-	Yes	-	Option 3: ditto 101	
113	-	-	Yes	No	Option 3 supported, but sites on the	- If sites are able to demonstrate OUV, they should

					<p>current tentative list which have invested significantly into the preparation of their bids and which can demonstrably prove their OUV should be given priority for submission after 2011, in advance of the streamlined two stage application process coming into effect.</p> <p>Option 4: appears to cut across discussions in relation to the Heritage Protection Bill and might therefore overcomplicate matters that the Bill seeks to clarify.</p>	<p>continue to be put forward, irrespective of overall numbers, without dilution of the WH brand.</p> <ul style="list-style-type: none"> - There should be clear criteria and guidance on successful nominations for sites on the TL including the length of time that nominations take and an indication of when it might expect to be put forward, so as to avoid unnecessary preparation costs. - Would seek clarification as to whether any re-nomination to make boundary or buffer zone changes would be an addition to, or instead of, a site from the new TL being put forward. - Suggested focus on future nominations that involve international linkages open up opportunities for increased international cooperation through bilateral agreements such as that between the Jurassic Coast and St. Lucia.
114	-	-	Yes	-	Ditto 72	
115	No	No	Yes	No	Ditto 61	<p>Ditto 12</p> <p>English Heritage resource should be focused on supporting a short TL and facilitating greater joint working between UK sites to aid the more cost-effective preparation of bids and help maximise benefits of inscription.</p>
116	-	Yes	-	Yes	Option 2: would enable the UK Government to encourage and consolidate the education and interpretation work at existing WHSs.	

					This would also allow time to consider Option 4: alternative designations.	
117	-	-	-	-	-	-
118	-	-	Yes	No	<p>Option 3: allows for greater consideration of the worth of Sites, especially important in the light of findings of the PWC report.</p> <p>Option 4: this might be an additional burden on an already extensive and complex system for designation of cultural assets.</p>	<p>- Would welcome any moves towards requiring proposers of WHSs to the TL to show greater consideration of their motives, combined with a full understanding of the true costs and benefits of applying for this status.</p> <p>- Would like to see more effort put into linking culturally and historically significant sites with others of a similar type outside the UK eg link Jarrow and Monkwearmouth with other early monastic sites in Europe</p> <p>- The idea of transnational sites could be used to support UNESCO's desire to see more nominations from under-represented countries if a country such as the UK were to tailor its TL towards linking its nominations with sites of a similar nature in under-represented countries.</p>

APPENDIX 2: FUTURE PROTECTION OF UK WORLD HERITAGE SITES

1	-
2	-
3	-
4	-
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6	-
7	-
8	-
9	-
10	- The WH Site can be a catalyst for much more than its visiting public. The existence of a WH site can generate community self-management programmes, or environmental awareness programmes.
11	- Awareness of WH among planners needs to be raised - Needs to be less bureaucratic and convoluted: some sites have several layers of protection; there is uncertainty over the meaning of buffer zones and sensitive areas.
12	-
13	-
14	-
15	-
16	-
17	- Essential that WH Sites are protected by heritage law - There should more government guidance and responsibility for WH sites and future sites - Perception of WH Site status should be refocused more strongly towards conservation
18	-
19	-
20	-
21	-
22	-
23	- Welcome the proposed statutory recognition of WH Sites in the draft Heritage Protection Bill - Strongly support the approaches and principles of the draft Planning Circular "Protection for World Heritage Sites", and the accompanying draft EH Guidance Note

	- Local Authorities must be persuaded to take their responsibilities for WH sites seriously
24	-
25	-
26	- 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.
27	- Support the proposed statutory recognition of WH Sites in the draft Heritage Protection Bill, the Review of Call-In Directions, and the principles of the draft Planning Circular "Protection for World Heritage Sites", and the accompanying draft EH Guidance Note. - Disappointed that the HPB does not strengthen protection more. - PPS 15 should reflect the UK's responsibilities under the WH Convention.
28	- Planning controls should be strengthened - Other impacts which do not have to go through the planning system (such as road works and transport projects) need to be controlled - Statutory protection is needed in order to prevent the current variable application of the concept of a "material consideration".
29	-
30	-
31	-
32	-
33	- The Heritage Protection Bill that puts the historic environment at the heart of an effective planning system is vital.
34	-
35	-
36	- Effective conservation and planning regulations must be applied in a way which responds to the special requirements of WHSs, allowing them to function as living communities, tourism destinations and rich repositories of a collective past. - WHS Coordinators should be afforded higher status within Local Authorities than they currently have, and be supported by well trained and experienced Conservation Officers.
37	-
38	-
39	-

40	<p>Government must :</p> <ul style="list-style-type: none"> - ensure that the Heritage Protection Bill progresses. - ensure that where WHSs are known to be at risk, it works with local stakeholders to assess that risk and undertake appropriate remedial action. - work with CLG to clarify and consolidate recent initiatives emerging from planning reform and in particular address emerging LDDs, climate change, and renewable energy - introduce in the proposed Heritage Register agreed statements for each of the WHSs which enable the UNESCO statement of OUV to be translated into limp and practical policies protecting these Sites.
41	-
42	-
43	<ul style="list-style-type: none"> - There is much to do to manage the impact of development on WHSs. This must happen nationally and internationally as there is a need to achieve greater clarity with UNESCO and its advisors on what is and what is not acceptable to them. - Statutory recognition of WHSs should be achieved at the earliest opportunity to demonstrate to the world at large the seriousness with which the UK regards its commitments under the WH Convention.
44	-
45	<ul style="list-style-type: none"> - Urge that the issue of enhanced protection for WHSs be addressed before the next election - Planning authorities should be given discretion on what is required in Design and Access Statements, particularly for properties that do not possess OUV, to reduce potential for considerable costs
46	-
47	-
48	Duplication - see 75
49	<ul style="list-style-type: none"> - There needs to be much greater clarity over the protection and status of WHSs and their promotion, funding and management.

50	- Would like to see a specific duty to have special regard to WHS in exercising planning functions across the UK.
51	-
52	-
53	-
54	-
55	-
56	-
57	-
58	-
59	<p>- Support recent and proposed changes to planning legislation and guidance which will improve protection for WHSs, and urge that the Heritage Protection Bill be brought forward..</p> <p>- Further consideration should be given to providing additional protection to Buffer Zones and the wider setting of WHSs in all emerging legislation and guidance.</p>
60	<p>- Local Authorities should have policies in their Local Development Documents which are designed to specially protect the OUVs 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 LDF.</p> <p>- 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.</p> <p>- The revised Heritage Protection Bill should be presented to Parliament at the earliest opportunity. In the interim it is essential that PPG15 is updated at the earliest opportunity.</p>
61	<p>- Stronger planning protection is needed, including the possibility of statutory protection such as that which applies to other protected landscapes, National Parks and AONBs.</p> <p>- Local and regional government should develop and disseminate consistent policies for the better protection of WH Sites.</p>

	<ul style="list-style-type: none"> - The new PPS should strengthen the requirements on local and regional authorities to develop better policies ditto. - Need clarification about : what constitutes a “significant development”; what is included in a “setting”, and who can make representations to the WHC.
62	-
63	- WH status is not needed to protect railway assets: 63 has a good record in terms of looking after railway heritage, working closely with a number of heritage organisations.
64	<ul style="list-style-type: none"> - Local Authorities and the national inspectorate need to treat WH as a key material consideration. - Planning legislation should be reformed, with a presumption against large developments near a WHS. - the UK must act on feedback from the 2008 UNESCO summit re: the poor state of 7 WH Sites.
65	<ul style="list-style-type: none"> - Welcome in principle the Draft Planning Circular, and proposed changes to legislation - Concern over implementation of proposed changes and buffer zones relating to the Tower of London: an integral part of a dynamic world city.
66	-
67	<ul style="list-style-type: none"> - Strongly support the Heritage Bill - The Act should be followed up with more detailed Circulars/ guidance in each jurisdiction that would bind Local Authorities and planning inspectors to the values protected by inscription, which go significantly beyond the buildings alone. - Guidance should include the implications of WH status, design, and landscape/setting appraisal. - The integration of the historic environment through the planning system needs to be supported. - Ideally policies should be introduced into LDP/LDF’s as soon as feasible following inscription. - Consideration should be given to giving WH Sites a status equivalent to the National Parks, but without the added

	bureaucracy of planning authority status. Site management plans could then be adopted by all planning authorities involved.
68	- Strongly urge the Government to instigate better cross- departmental working.
69	
70	<p>- Urge DCMS to lobby strongly for the WH Circular to be finalised and published as soon as possible.</p> <p>- Suggest that DCMS collate good practice from Local Authorities which have successfully integrated the WH Circular’s policy into their LDF’s.</p> <p>- DCMS should have a long term goal to create a consistent and clear statutory designation for WH Sites, rather than rely on the planning system and a set of other designations that cover Sites or parts of Sites, and were originally established for other reasons.</p>
71	-
72	-
73	- The planning system in England provides for the identification and protection of sites of exceptional heritage value.
74	- Suggest that Defra might work with DCMS for the Government on global WH natural sites.
75	<p>- There should be a consistent approach to the protection and support given to WHSs in the UK: the UK Heritage Protection Bill, the proposed Scottish Heritage Bill, and the consolidation of Scottish planning policy all offer opportunities for this.</p> <p>- Support, research, guidance and funding in relation to climate change and WHSs must be developed and progressed.</p>
76	<p>- Suggest that guidance set out in the English Heritage consultation “Seeing History in the View” (April 2008) is strongly encouraged.</p> <p>- There should be further national guidance setting out responsibilities of Local Authorities, to protect WHS setting and context from developments beyond the buffer zone of Local Authority in which the Site lies.</p> <p>- A general duty should apply to public bodies with respect to WHSs, as for instance exists for AONB’s.</p> <p>- Recommend that WH Sites should be given the same protection as National Parks, AONBs and SSSIs. WH Sites, by their very nature are of international significance and accordingly should have the highest level of protection.</p>

77	-
78	-
79	-
80	
81	<ul style="list-style-type: none"> - The available toolkit of controls is sufficient - Doubt that additional regulation will be matched by additional public benefit. - If there is lack of protection, the problem is political i.e. Gov or Local Authorities decide to overrule the protection system. This can only be solved by political lobbying by UNESCO, ICOMOS, or national and local bodies. - Implementation of the control regime is poor because of lack of resources in planning and conservation in Local Authorities. - Buffer zones must be relevant and proportionate: there should be no automatic assumption of a zone of a certain size eg a 10 mile buffer zone around Hadrian's Wall. - The new legislation should be in clear English, describing what requires consent and what does not, and when expert advice must be sought.
82	<ul style="list-style-type: none"> - Need a unified approach to heritage in the planning system - Need to deal with the threat of tall buildings in the London Borough of Greenwich and adjoining boroughs, and inappropriate development in and close to the WHS. - Investigate alternative means of protection through other means than primary legislation.
83	- Historic Scotland should take a more strategic role in Scotland by working more closely with Local Authorities which either have WHSs or are considering making bids.
84	- Welcome the intention to give statutory status to WHSs: this should be ensured by WHSs being explicitly named as Heritage Assets in the Statutory Instruments allowing the provisions of the Planning Act 2008 (ref. Section 32: meaning of "development") to be brought into force.

	<ul style="list-style-type: none"> - Look forward to seeing strengthened planning guidance in the forthcoming PPS - Welcome the emphasis placed on the need for buffer zones - It needs to be emphasised in Government advice that competing and other interests must come second to the needs and protection of a WHS itself.
85	- "Protection and management regimes should not vary greatly, if at all, between sites which by an accident of policy or timing find themselves on the WH List and those for whom the door is shut eg St. Paul's Cathedral should be protected no less than Canterbury Cathedral. This would show full commitment to the WHC, take away pressure to add new sites to the WH List, and eliminate perceived or actual anomalies between the designation of sites of equal heritage value within the UK and renowned as such worldwide."
86	<ul style="list-style-type: none"> - Welcome recent measures to enhance protection of WHSs (Call-In Directions, the new planning circular and guidance). - Should the draft Heritage Bill be taken forward, would strongly support the introduction of a duty for Local Authorities to have special regard to WHSs in exercising planning functions.
87	<ul style="list-style-type: none"> - Statutory recognition by the proposed Heritage Protection Bill would have a significant impact on the degree of protection afforded to sites, and to awareness of the status of inscription. - New planning guidance should be followed by similar guidance throughout the UK, with further guidance for planning authorities - There should be periodic review of planning decisions and development to assess the effectiveness of guidance
88	
89	- Strengthen planning laws
90	- The Govt should endorse the concept of WHSs within the planning and heritage protection processes and commit itself to according WHSs appropriate levels of care and protection.
91	-
92	-
93	- The question of buffer zones has become increasingly important. Contemporary developments, not least high

	<p>developments, require constant vigilance. Greater clarity on the definition, administration and management of buffer zones would be welcome.</p> <p>- Many WHS boundaries were defined too narrowly. It would probably be beneficial for the relevant UK authority to call for a re-evaluation of the geographical boundaries of all its WHSs, in light of the sounder understanding of how the boundaries of a WHS need to be defined, without requiring a new submission of Sites to UNESCO.</p>
94	- Strengthened protection is needed: current planning system is not adequate to care for and protect WHSs in a sustainable manner.
95	-
96	-
97	-
98	-
99	- With WHSs set to become a statutory designation, the framework for national consistency should be considered.
100	<p>- Welcome the intention to give statutory recognition to WHSs, and protection through measures described in 7.8.</p> <p>- There is a need to ensure that the utility companies comply with standards to be adopted in the Supplementary Planning Document, particularly 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.</p>
101	-
102	<p>- There needs to be an increased emphasis on the protection and appreciation of WHSs, re-identifying a connection with the principles behind our protection of outstanding natural and cultural resources.</p> <p>- There needs to be an explicit and specific statutory duty to have special regard to WHSs in exercising planning functions.</p>
103	- There needs to be a specific duty to have special regard to WHSs in exercising planning functions either in the Heritage Protection Bill, or in other legislation.
104	-
105	- If the Heritage Protection Bill is not forthcoming, urge the Government to find alternative ways to enhance protection as soon as possible.
106	-

107	- Strong case for reviewing what mechanisms (beyond the possibility of WHS status) are in place for protection and appropriate management of the important heritage of the UKOTs/CDs.
108	-
109	-
110	-
111	-
112	-
113	- Urge DCMS to lobby strongly for the Heritage protection Bill to be progressed. - Need clarification on costs and detailed requirements relating to the recent extension of Article 1(5) Land to include WHSs.
114	-
115	-
116	-
117	-
118	- Planning authorities can be reluctant to deal with proposed development in or near to a WHS or its buffer zone, perhaps due to a lack of detailed knowledge. Development is inevitable, so clear guidance is needed in order that they can evaluate how a Site will influence and respond to this development.

APPENDIX 3: FUTURE MANAGEMENT OF UK WORLD HERITAGE SITES

1	-
2	-
3	-
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6	-
7	-
8	-
9	- There is a danger of confused objectives: WH created in order to protect, not to generate tourism (this is from a tourism company)
10	-
11	- Awareness in schools, among residents and visitors needs to be raised - Access (physical and virtual) to all sites needs to be improved.
12	-
13	-
14	-
15	-
16	-
17	-
18	-
19	-
20	-
21	-
22	-
23	- There should be more sharing of experience and examples of good practise between existing UK Sites

	- A management plan is of central importance
24	-
25	- Production of a management plan gives focus and direction, which helps to progress projects
26	-
27	-
28	- There needs to be a closer connection between the OUV of the Site, and the management plan
29	-
30	-
31	- There needs to be a recognition that history is a continuum and that some change is inevitable to respond to new technology and the modern world and that, unless that degree of change is permitted, there is a risk that the asset will deteriorate. There should be appropriate policies in management plans, clarifying planning guidance to apply to issues such as tall buildings.
32	- Allowing dynamic urban areas to develop will require careful consideration to policy development and future management of sites.
33	- A high level code of practice, or set of aspirations, describing what WHS status means and requires in the UK would provide clear guidance for managers and planners, and a more consistent experience for tourists and visitors. - There would be immense benefit in establishing formal networks between established WHSs and Sites aspiring to be nominated, with regular meetings, site visits, and training sessions.
34	-
35	- Need general guidance, particularly to aid appreciation, understanding and protection of the context of sites as well as of their specific features.
36	-
37	-
38	-
39	-
40	- Government can reinforce and support a strategy on WHSs and a network for communication by strengthening the capacity of the LAWHF.
41	-
42	- DCMS should offer more support and guidance to help empower local groups to better manage and have a real sense

	<p>of ownership of Sites, as well as to ensure that benefits of WH status are realised.</p> <p>- Better networking between Sites across the UK and internationally should be encouraged, using examples such as partnerships established by the Jurassic Coast, Kew, and the FRE.</p>
43	<p>- Proposals for improved management and coordination are welcomed, but need to be developed.</p> <p>- Clearly improved definition of who is responsible for what and greater clarity of roles is desirable</p> <p>- Recognition of the need for closer inter-departmental working both as part of international strategy, and within the UK.</p> <p>- All government departments and agencies whose actions can affect WHSs must be thoroughly aware of their responsibilities, particularly CLG and Defra (and its agencies)</p> <p>- There should be improved networking, though more work will be needed to define the role and character of such a network, particularly if it builds on existing networks.</p>
44	<p>- Would welcome stronger international links</p> <p>- Would welcome greater clarity about lines of responsibility and how they are shared and/or devolved.</p> <p>- Support the need for a full time WHS coordinator</p>
45	- Welcome proposals for a stronger network: this could be supported through the LAWHF
46	-
47	-
48	Duplication – see 75
49	<p>- Delivery of softer benefits should not be seen in isolation, but rather should be seen as a mechanism for delivering Government objectives such as the sustainable communities programme, healthy living programme, education, citizenship etc.</p> <p>- There is a need to acknowledge wider departmental responsibilities for WHSs beyond planning and conservation.</p>

	<ul style="list-style-type: none"> - It would be highly beneficial for most departments to have WH policies and for the DCMS, as the lead government department for WH, to take a more coordinating role with other ministries and departments. - There is an urgent need to map the involvement of government departments in the WH process in order to ensure complementarity. - There is a need to develop research agendas on how WHSs can contribute to, for instance, civic pride and social capital. - There is a need to define clearly responsibilities for all stakeholders in relation to obligations of the Convention. - Structured links should be put in place between individual WHSs and the UK/UNESCO bilateral agreement. - There is a need for site management to be put onto a more appropriate, formal, and systematic basis, which recognises the necessity for a focal point for each WHS to coordinate activities much more widely than in the field of planning and conservation. This calls for a coherent, national, management strategy linked to resource allocation.
50	<ul style="list-style-type: none"> - It is essential that all Government departments and agencies work together to meet Government's aims and obligations with regard to the Convention and UNESCO. - WH provides a unique opportunity to raise awareness of global issues and hence to act as a means of achieving both UNESCO's mission and the UK Government's aims and commitments to the developing world – especially Africa – and in dealing with climate change and international sustainable development.
51	<ul style="list-style-type: none"> - Need increased communication with landowners to ensure that they are aware their land lies within the boundary of a WHS; this is especially pertinent in areas of wide geographical distribution e.g. Cornwall and West Devon Mining Landscape and Hadrian's Wall during the designation process. - It would be beneficial for DCMS to provide clear guidance for landowners on implications of being in a WHS and on their responsibilities. - It may be that future nominations may cover the seabed. Early consideration of how the seabed would be managed if designated, especially in relation to defence related activities such as dredging, would be welcomed.
52	<ul style="list-style-type: none"> - Natural Sites in the UKOTs urgently require management to avoid species eradication on Henderson Island and Gough

	<p>and Inaccessible Islands.</p> <p>- There should be a more “joined-up” approach to management by the Government (DCMS, Defra, FCO and JNCC)</p>
53	-
54	-
55	-
56	-
57	-
58	<p>- Management plans should include an equality plan, providing a clear statement of how the issues around equality and diversity will be addressed as part of ongoing management.</p>
59	<p>- Would welcome stronger support and guidance but feel that this should include more specific recommendations and timetables for actions, supported by proposals for funding.</p> <p>- Strongly support proposals to put the management of WHSs on a firmer footing with better central networks to promote a consistent approach to management.</p>
60	<p>- Nationally led, clearly articulated policy and strategy related to WHS should help to maintain a commitment to best practice protection, management and presentation.</p> <p>-Responsibilities at national, regional and local interests need to be articulated, coordinated and supported.</p> <p>- Links to other government agendas and across government departments are key to provide the necessary national framework for management: led by DCMS.</p> <p>- Nationally led capacity building for WHS coordinators and Local Authority planners should be designed and implemented.</p> <p>WHS coordinators are necessary to achieve the greatest benefit from designation through implementing the management plan and providing focus and coordination.</p> <p>- All management policies must comply with sustainability guidelines but must also sustain the OUV of the Site. This must be considered when estimating benefits from tourism and regeneration.</p>

61	<ul style="list-style-type: none"> - Would be keen to develop further the idea of how best practise might be shared through the International National Trusts Organisation (INTO), twice-yearly meetings of WH Coordinators, and other as yet unexplored mechanisms. - Would be keen to participate with the government in addressing the lack of integration between natural and cultural sites, the need for better coordination between sites, and the inadequacy of the skills base for conservation management. - The roles of NGOs and owners should be included in the discussion about the need for clearer lines of responsibility. - Support the idea that there needs to be a more joined-up approach to WH across all relevant government departments and internationally. - Fully agree with the need for effective, integrated conservation management planning and the need to recognise social, environmental and economic values and the responsibilities that pertain to them. - Agree with the need to involve local communities in decision making and consensus building, and would emphasise links with the European Landscape Convention in this respect.
62	-
63	<ul style="list-style-type: none"> - Management of railway sites must not impede maintenance and further development of the railway. Permitted Development Rights must be retained in all cases. - Decisions with regard to performance and safety must remain with 63.
64	-
65	-
66	-
67	-
68	<ul style="list-style-type: none"> - There should be a strengthening of management arrangements - Publication of new guidance on management should not be at the expense of a review of the policy for the management of WH Sites

	- Would welcome the establishment of a representative body, such as the existing one for AONB's, which could provide opportunities for shared experience and formulation of best practise.
69	- A more joined-up approach to the management and interpretation of sites is evident in Scotland: not reflected in the Review paper.
70	<p>- Future guidance should make clear the processes involved in the future if a Site wishes to pursue boundary changes, changes to or introduction of buffer zones, or international linkages.</p> <p>- Welcome suggestions with regard to greater clarity about lines of responsibility at government and national agency level.</p> <p>- There needs to be a consistent approach across Government departments in assisting those Local Authorities with management roles for existing Sites</p> <p>- There should be a more joined up approach to WH as part of the Government's international strategy. This is a particular issue for the Jurassic Coast, where respective roles between EH, Natural England, DCMS and Defra still need clarification.</p> <p>- There is an understanding that the Steering Group has a "mandate to manage" the Site from DCMS, but this has never been confirmed formally or in writing. Would like to know the position on other Sites, and would suggest that a formal mandate would be good practice for all Sites.</p> <p>- Would welcome better communication about relevant UNESCO/ DCMS/ WHC developments and sharing of best practice and research. DCMS could perhaps draw together the relevant organisations and agencies to discuss this.</p>
71	<p>- WH status should be given full statutory protection in heritage legislation across the UK.</p> <p>- WH status should be provided with more robust protection and management measures in the forthcoming Scottish Heritage Bill legislation.</p>
72	- A better process for identifying candidate WHSs with greater clarity about economic and social purposes and linked to a hierarchy of status designations would help to improve management and promotion.
73	-
74	-

75	<ul style="list-style-type: none"> - Would like to see the UK government forming a stronger central role relating to the support and management of WH Sites. This should include facilitation of best practice, stronger and more structured reporting mechanisms, clearer guidance, easier access to help and support, improved coordination across administrations and between natural and cultural interests. - Welcome the commitment to look after existing Sites - There should be better communication and shared information between Sites, government and partners.
76	<ul style="list-style-type: none"> - Strongly support the proposal to develop closer inter-departmental working and a more joined-up approach to WH. - The management plan should set out how the Site would operate in a financially independent manner.
77	-
78	<p>IUCN and ICOMOS are keen to encourage management approaches that take account of the reasons for inscription and the diversity of additional interests that sit within WHSs: this is an important approach to Site management which will allow us to understand and reflect on the values of WHSs.</p>
79	-
80	-
81	<ul style="list-style-type: none"> - Agree that there is a need to strike a balance between the needs of conservation, access, the interests of the local community, and the achievement of sustainable growth, and that change is inevitable. - Guidance must make it clear that change is not automatically wrong, but may be necessary and desirable. If there is a perception that it is unreasonably difficult to get permission in a WHS, this will effect the local economy. - Endorse the need for management plans: stakeholders should include a significant number of owners of property in the WHS. - There may be a case for better coordination and sharing of skills, but this does not require a new bureaucracy. There should be more opportunities for WHS coordinators and others to meet and/or communicate good practise by email.
82	<ul style="list-style-type: none"> - DCMS needs to take a more coordinating role with other departments including CLG.

	<ul style="list-style-type: none"> - There is a need to put in place a more systematic approach to management and resources that recognises the need to integrate national, regional and local interests and responsibilities. - Site management needs to be put on a more appropriate and systematic basis which recognises the need for a focal point to coordinate activities more widely than in just conservation and planning, through <ul style="list-style-type: none"> a) delivering the Man. Plan b) links between WHSs and wider Gov. agendas such as sustainable communities, healthy living etc c) optimising capacity to deliver education, citizenship, sense of identity, well-being, and sustainable development d) promoting international collaboration in line with the UK UNESCO bilateral cooperation agreement. - Develop research agendas on how WHSs can contribute to civic pride and social capital.
83	<ul style="list-style-type: none"> - A Scottish WH Forum should be set up to share best practise - Lines of responsibility and how they are shared and/or devolved need to be clarified - There should be closer working between Gov. departments; between central and local gov., and a more joined up approach including an enhanced website. - The website should pay more attention to the differences between the devolved nations that make up the UK.
84	<ul style="list-style-type: none"> - Support proposals in 7.3 - Stronger management arrangements and a more systematic exchange of good practise between sites would be beneficial - There is a need to ensure that wide consultation and the strict implementation of planning safeguards are undertake. - The issue of dominant stakeholders must be taken into account in both the structuring of the Management Plan, and in ensuring that guidance with regard to implementation is independent of dominant interests. - There should be a wider sharing of knowledge and experience with other WHSs both in the UK and elsewhere.

85	-
86	<ul style="list-style-type: none"> - Welcome proposals for strengthening coordination, networks and communications. - Would welcome the appointment of full-time coordinators for all Sites to maintain the WHS management plan cycle and strategies for delivery - Particularly commend the suggestion that interpretation and education and learning strategies be included in future WHS management plans. - There should be a nationally supported strategy for education at WHSs, building on the ethos of the WH Education Resource Kit.
87	<ul style="list-style-type: none"> - Importance of appropriate management and presentation of the existing WHSs in the UK cannot be over-emphasised. There may be a case for central government having a greater role in setting standards. - The need for greater clarity of roles within a more coordinated WH management system in the UK is evident and its resolution much overdue. - Most suggestions in the Consultation document are levelled at the Sites and their coordinators. The role of local communities and WH coordinators is of prime importance, but central government should perhaps be more proactive in raising awareness of WH issues, and establishing minimum standards for conservation and management in the UK.
88	-
89	-
90	-
91	- Welcome suggested expansion of links with the international community.
92	-
93	<ul style="list-style-type: none"> - The process of creating a management plan fostered a sense of partnership among key stakeholders - A WHS needs to be thought of as one cohesive entity, without compromising the autonomy of the individual stakeholders.

	- Protection and management of WHSs requires sensitive incorporation into visions for regeneration.
94	- Would welcome wider consultation amongst those concerned, including local residents and amenity societies, on the management of existing WHSs.
95	- There should be greater joint working between UK Sites and other “like” Sites to maximise benefits of inscription.
96	-
97	- Concerned at the idea of more international cooperation (interference?), especially by unelected and inflexibly cumbersome bodies such as ICOMOS.
98	-
99	- Require a greater degree of consistency in management at a national level: AONB’s could be a model. - Greater cooperation and integration is needed between Government departments
100	- Need to clarify lines of responsibility, provide a more joined-up approach, and provide a stronger WHS network. - There must be clear accountability through the Local Authorities for ensuring that an appropriately constituted Steering Group is in place for each WHS, that it is functioning effectively and that the Management Plan is adequately resourced and is being implemented properly. - There should be effective Government mechanisms for intervening if local arrangements fail to deliver the required results. - Suggest that DCMS should consider whether the management structures adopted by the individual WHSs are strong enough and well enough resourced to deal with the level of complexity of each Site. - Each WHS Steering Group should be able to call on international expertise to advise it, through the network proposed in 7.16.
101	-
102	-
103	- There should be greater integration of learning and education strategies within the management of sites
104	-
105	-

106	<ul style="list-style-type: none"> - Need formalisation of a strong partnership structure with clear management arrangements - Need the opportunity to exchange skills and good practise.
107	<ul style="list-style-type: none"> - The concept of managing UKOT sites as if they were WHSs has been advanced, and even enshrined in relevant documents, for South Georgia and Chagos archipelago - Need to find out how WHS status or novel alternative designations could best be used in concert with other international designations.
108	-
109	- Opportunities should be developed for cooperation with partners from neighbouring State Parties and those with transboundary site connections with a view to mutually informing and improving management principles and promotion.
110	-
111	-
112	-
113	<ul style="list-style-type: none"> - There needs to be recognition of the involvement of Natural England and IUCN in the management of the Jurassic Coast - the role of Defra and Natural England with regard to natural WHSs needs to be clarified. - Would welcome better communication about relevant UNESCO/ WHC developments and sharing of best practice and research. - A network to pursue shared goals/concerns such as capacity development, communications, skills, international cooperation, evaluation and risk should be developed through the LAWHF.
114	-
115	-
116	- Suggest that at the same time as the Periodic Report, Governments report on the state and/or development and impact of their learning and interpretive services at Sites in their territories.
117	-
118	-

APPENDIX 4: FUTURE FUNDING OF UK WORLD HERITAGE SITES

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9	- Danger of false expectations of financial gain needs to be countered
10	-
11	-
12	- There should be direct government or RDA funding for a full time coordinator at all sites to maximise objectives and benefits of WH inscription.
13	-
14	- Ditto 12
15	-
16	- Ditto 12
17	-
18	-
19	-
20	-
21	-
22	-
23	-
24	- There is an urgent need for a national system of funding and resource allocation for all WH Sites

25	-
26	-
27	-
28	-
29	-
30	-
31	-
32	- Resources are needed to ensure that sites are protected and managed in a sustainable manner.
33	- Financial support is needed.
34	-
35	-
36	- Budgets should be assigned to protect WHSs.
37	-
38	- Ditto 12
39	-
40	- There must be consistency and transparency in funding for the management and presentation of WHSs in the UK, and this should include a contribution from Government as the State Party. - The Secretary of State should recognise the costs falling on Local Authorities and accept that the benefits that are likely to come to the Site are intangible and for the public and national good.
41	- The Secretary of State should bring forward a strategy to ensure that necessary resources are directed at the conservation of heritage assets and historic landscapes of WHSs. - There should be an explicit acknowledgment of the significant role of Local Authorities in contributing to meeting the obligation to transmit OUV to future generations, and the costs of this falling to them.
42	-
43	- More effective networking and liaison will have some resource implications. - Collective awareness raising will need resourcing
44	-
45	- There is need for a coherent approach across Government departments in assisting those Local Authorities with a management role

	<p>for existing Sites: WHSs can contribute to the work of DCFS, CLG, DTI and the Foreign and Commonwealth Office.</p> <p>- Sites can deliver social capital, but this requires funding and staff time to deliver.</p>
46	-
47	-
48	Duplication – see 75
49	<p>- There needs to be a national system of bespoke ring-fenced funding, with extra resources over and above what is currently provided for existing posts, with a proportion of funds allocated nationally and supplemented locally, possibly through RDAs, and through grant in aid to Local Authorities.</p> <p>- There needs to be an overall national resource allocation for promotion to raise awareness of Sites more generally across the UK.</p>
50	-
51	-
52	<p>- Natural Sites in the UKOTs urgently require increased funding for their management. Without these resources, there is the real possibility that Sites will be eligible for listing on the WH in Danger List.</p> <p>- There should be increased resources allocated to the OTs through the opening up of Lottery funds.</p>
53	Ditto 12
54	-
55	-
56	-
57	-
58	-
59	<p>- A coordinator is needed, with funding from a central source. A full time dedicated member of staff may not be necessary for all sites but, on the other hand, some Sites may need more than one member of staff.</p> <p>- Urge the creation of a national system for resource allocation to WHSs, with funds allocate nationally and supplemented locally as required.</p> <p>- Inscription should not be dependent upon available funding: if OUV has been established, resources should be made available nationally, from a central source.</p>

60	<ul style="list-style-type: none"> - See Protection: Article 1(5) Land and its implications. - WHSs should be eligible for grant aid within the Planning and Compulsory Purchase Act. - If nomination is to be slowed and a focus given to management, protection and presentation, some national allocation of resources should be provided much as it is for AONBs. - Provision of financial resources would help to ensure that coordinators are not losing time seeking financial support for their own salaries.
61	<ul style="list-style-type: none"> -Need a more consistent approach to funding of WHS Coordinators, and to their role, authority, and reporting lines. - Need advice on what funding mechanisms are available
62	<ul style="list-style-type: none"> - There should be direct government or RDA funding for a full-time Coordinator at all sites. The Government is required by UNESCO to secure the proper management of the UK's WH Sites. - English Heritage's resources should be focused on supporting a short TL and facilitating greater joint working between UK sites to aid the more cost-effective preparation of bids and maximise benefits from inscription.
63	-
64	-
65	Successful implementation of the management plan is dependent on funding, which is not secure.
66	-
67	Appropriate funding should be allocated for promotion.
68	- Resources need to be made available for heritage protection.
69	-
70	<ul style="list-style-type: none"> - There should be Government support towards core funding WH Sites in the same way that there is for National Parks and AONBs, which arguably are a lesser level of designation. It is unreasonable to expect hard-pressed Local Authorities to increase investment in a discretionary function. - When a WH Site is included within Local Area Agreement targets, the implications of the funding required for the necessary management needs to be taken into account.
71	-
72	-

73	-
74	-
75	- Need better funding, and a Coordinator for each Site. - Essential to invest time and resources to look after existing Sites. Core funding from the Government should be provided.
76	- Funding for site management should come from local partnership initiatives, the private sector and the heritage Lottery Fund as set out in the management plan.
77	-
78	-
79	-
80	-
81	-
82	- There needs to be a national system of resource allocation, with a proportion of funds allocated nationally and supplemented locally, possibly through RDAs. The system in place for AONBs may be appropriate.
83	Each WHS should have a full time Coordinator, and core funding in place. However, question where this will come from?
84	- Would welcome enhanced call-in procedures, but they would only be effective if English Heritage were provided with sufficient funding and staff to take on concomitant responsibilities. Otherwise, we see potential dangers in giving English Heritage the last word in recommending call-ins for WHSs
85	-
86	-
87	- There may be a case for central government targeting grant aid for improvements in management and presentation of the existing WHSs in the UK.
88	- There should be a dedicated funding source to assist Local Authorities, which accept their responsibilities at a local level.
89	- Provide adequate funding for detailed archaeological and historical research to enhance understanding and significance of sites. - Increased provision must be made to support existing Sites
90	- Legislative protection should be supported by funding
91	-
92	-
93	- National funding agencies need to be made aware of the overriding importance of WHSs, and to work this into their funding policies and priorities: DCMS could play an active role?

	<ul style="list-style-type: none"> - Strong case to be made for DCMS to make a sum of money directly available for WHSs, adjusted to reflect both inflation, and the number of Sites inscribed. - Funding is needed not only for repairs, but for accessibility, site interpretation, and to deal with visitor numbers. - Site owners need more financial assistance and better guidance as to how they can manage ICOMOS/DCMS expectations of public access. - Cathedral funding is determined by criteria which do not factor in their importance as WHSs, and can work against them.
94	<ul style="list-style-type: none"> - Resourcing is needed for English Heritage - Resources are needed to manage the WHSs we already have in a sustainable and proper manner.
95	-
96	-
97	-
98	-
99	- Require a greater degree of consistency in funding at a national level
100	-
101	-
102	-
103	-
104	Ditto 12
105	<ul style="list-style-type: none"> - There should be full time WHS Coordinators at each Site with core funding - Local Authorities should be allocated core funding for the care and protection of Sites.
106	- There should be a robust funding package to manage ongoing research, conservation, presentation and education.
107	- There is a need to address the current ineligibility of UKOTs/CDs for Heritage Lottery Funding, and confusion in lottery bodies between UKOTs/CDs (which are UK territory) and Commonwealth countries (which are not).
108	- Funding is needed to address serious threats by invasive alien species on Henderson and Gough Islands, to secure the long-term future of these WHSs.

109	-
110	-
111	-
112	-
113	<p>- There should be a consistent approach across Government departments in assisting Local Authorities with a management role for existing Sites, to help them deliver DCMS' policy aims.</p> <p>Ditto 70</p> <p>- The LAWHF should be properly resourced to act as an agency for coordination and promotion</p>
114	-
115	Ditto 12
116	-
117	-
118	-

APPENDIX 5: FUTURE PROMOTION OF UK WORLD HERITAGE SITES

1	-
2	- Link between WH and the Cultural Olympiad should be recognised and promoted by nominations in 2011 and 2012
3	-
4	-
5	-
6	- WH not seen as relevant by significant sections of the British population: clearer focus needed on target audiences
7	-
8	-
9	-
10	- An improved education programme specifically for politicians and the media is needed, to make them understand the wider benefits of WH.
11	- Need to counter misconceptions that inscription brings access to cash; that it is a statutory planning designation; that it stifles local enterprise and development, through education. - Look at education programmes currently used at WHSs and at other sites and learn from the best - Keep up a steady flow of information to the media, schools, tourist outlets - Increased research (eg excavations) can be used to raise awareness.
12	-
13	-
14	-
15	-
16	-
17	- Greater emphasis needed on locally based activities at WH Sites, particularly support for community involvement in the care of the Site.

	<p>- WH Sites and sites wishing to become WH Sites should have a formal duty conferred on them to promote their status, and the philosophy of WH.</p> <p>- WH and other heritage issues should have greater place in schools curricula</p>
18	- Use the creation of the TL as a means of engaging the public, and the voluntary and private sectors in WH much more
19	-
20	-
21	-
22	-
23	-
24	- National funding needed for promotion and awareness raising
25	-
26	- UNESCO values should be much better presented
27	- These issues already being dealt with by individual sites, and the WH Coordinators' Forum.
28	-
29	-
30	-
31	<p>- Much more can be done at the national level to promote awareness of WHSs in the UK, through agencies such as VisitBritain, and English Heritage.</p> <p>- Development of UK World Heritage Tours could establish new incoming tourist routes – such as the local themes of defence of the realm and cultural seascape – within the UK to sit alongside those that are already well established.</p>
32	-
33	-
34	-
35	- The WH “brand” needs to be better known, and its significance appreciated
36	<p>- Educational potential of WHS designation is important: used to strengthen pride in the locality and to help young people to connect with a proud and creative past.</p> <p>- WHSs should play a key role in the run-up to London 2012, including part of the Olympic Torch Relay.</p>

	- The lead role of DCMS in promoting the value of WHSs is vital, especially in ensuring that Local Authorities and other government departments are aware of the economic and social benefits of WHS status.
37	-
38	-
39	-
40	- Government can contribute to raising awareness of WHSs by contacting directly, Leaders and Chief Executives of Local Authorities to encourage them and enlist their corporate support. - Presentation and promotion of WHSs must be supported within a wider strategy for WHSs.
41	-
42	- More could be done to promote WHSs through DCMS' NDPBs.
43	- Support the idea of an enhanced website: needs to be more prominently accessible than is currently the case. - A WHS network could contribute to awareness and education. - Some opportunities should be used collectively, such as the Cultural Olympiad.
44	-
45	- If the suggested public misconception that in relation to WHSs "more means less" exists, Government should take action to raise awareness of the concept of OUV and the global significance of WHSs. - Government should support the Local Authorities to enable delivery of awareness raising and promotion. - Question whether investment in more widespread use of the WH logo would deliver much return if not accompanied by a proactive national campaign in promoting WH values and explaining what the logo means. - There should be linked educational and interpretative strategies. - There is even greater potential for contributing to cross-curricular and interdisciplinary initiatives within formal education, and intergenerational, family focused learning.
46	-
47	-

48	Duplication – see 75
49	<p>- WHSs as international places should each have a national champion whose responsibility is to ensure that the full values of their property are understood at all levels and that proper attention is given to delivering the softer benefits. Such a champion is not the same as the Property Manager.</p> <p>- More attention needs to be given to education as a means of linking people with WHS places.</p>
50	<p>- There should be a UK-wide strategy for promoting WHSs, with central Government taking a more proactive line in encouraging greater appreciation of issues as well as promoting standards of conservation, best practice, etc.</p> <p>- The 2012 Olympiad provides a hook on which to hang promotional developments, create networks and raise awareness, and WHSs should be encouraged to take a lead here with a range of local and regional activities.</p> <p>- 2012 coincides with the 40th anniversary of the World Heritage Convention.</p> <p>- Greater integration of learning, access and education strategies within the WHS management would be an area to develop and promote centrally across the UK.</p> <p>- WH issues should be better addressed in the national schools' curriculum.</p> <p>- Support the suggestion of an improved website focusing on WH</p>
51	-
52	-
53	-
54	-
55	-
56	-
57	-
58	- A "one stop shop" website to access best practice on heritage management would be beneficial. This could be supported by making more use of existing for a such as the LAWHF or perhaps creating a UK WH Forum supported by DCMS.

59	<p>- Creation of accessible forums, central resources and websites with information and best practice for Local Authorities would be beneficial. This does however need to be funded and coordinated at a national level, with one clear focal point and source of national guidance.</p>
60	<p>- Greater national appreciation of the worth of WH status would boost local pride.</p> <p>- Government should take the lead nationally for the promotion and awareness raising which would assist in raising civic pride and thereby social capital.</p>
61	<p>- DCMS should gain maximum value from its role as the department responsible for heritage and for sponsorship of tourism: this is not currently the case. For example, there are limited, if any, references, to the historic environment in the DCMS tourism strategy for 2012 and beyond.</p> <p>- There need to be stronger networks for sharing and learning, especially with regard to the understanding significance and values in local communities.</p>
62	-
63	<p>- Already carry out educational activities including safety awareness; educational visits have significant safety risks.</p> <p>- Already work towards civic pride through commitment to preserve all sites and surrounding areas.</p>
64	-
65	-
66	-
67	<p>- The Cultural Olympiad would provide an excellent vehicle for promoting UK World Heritage Sites.</p> <p>- DCMS should have a programme to promote and publicise inscribed sites in the UK and abroad.</p>
68	
69	<p>- A more concerted approach to promote and celebrate WH could be useful, though this should be part of wider efforts to increase understanding of and commitment to the conservation and management of natural and cultural heritage generally.</p>
70	<p>- There is work to be done to raise WH awareness: currently this is done at Site level. This needs to happen at national level: funding allocated, a delivery body identified (the LAWHF not necessarily the best forum), and partners approached.</p> <p>- Simplification of the rules regarding use of the WH logo would be welcomed.</p>

	<ul style="list-style-type: none"> - All WH Sites should be encouraged to use the logo. - The Jurassic Coast is leading on a UK-wide project with all WHSs to help coordinate educational strategies and programmes: this should be encouraged and properly resourced at a national level.
71	- Clear and transparent coordination between the UK Government and devolved government in Scotland is required to enable adequate promotion of suitable nominations from across the UK.
72	-
73	-
74	-
75	- There should be a concerted effort driven by the four UK administrations to increase educational activities relating to WH; cultural and natural. There should be secured funding for this, and development of educational and research strategies.
76	- Use of the Greenwich Maritime WHS in the London 2012 Olympics provides an excellent opportunity to promote WHSs specifically and UK heritage more broadly.
77	<ul style="list-style-type: none"> - States Parties are encouraged by UNESCO to develop educational activities with relation to WH, but in the UK it is left to the few to promote and develop Sites. WH is not included in the National Curriculum. There needs to be a joint strategy for building awareness. - Awareness of WH landscape and geology could be promoted by bodies such as the Earth Science Education Forum for England and Wales, and the Scottish Earth Science Education Forum. - In the UK we need to push one site where all WHS information can be made available.
78	-
79	The UK is in a good position to use WH Sites as beacons of good practice in relation to the issues which face the wider heritage nationally and internationally. Somerset Levels and Moors would be an ideal Cultural Landscape in which to develop robust and effective solutions to the threats of climate change and sea-level rise which endanger wetlands and their heritage around the globe.
80	-
81	- WHS management can provide opportunities for promotion and educational initiatives eg work of Hadrian's Wall Heritage Ltd
82	<ul style="list-style-type: none"> - Put in place an overall national allocation for promotion - Promote links between WHSs and Government departments to underscore the potential of WHSs to deliver many Gov. agendas.
83	- A range of events should be identified to which promotion of WH could be tied, including the Cultural Olympiad, and the

	Commonwealth Games.
84	- Concepts of sustainable tourism centred on, but not exclusive to the WHS must be developed, with a supporting effort to ensure such outcomes such as longer dwell time in the region. This in itself will not only increase local benefit but also make the visit more meaningful in cultural and educational terms.
85	- The consultation on the new TL provides an opportunity to raise the profile and awareness of UNESCO and the WH Convention. To this end, "current reviews of policy and guidance should be revisited, reformulated, and coincided with international expectations and standards."
86	- WH 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. - The 2008-2012 Cultural Olympiad provides excellent opportunity for joint promotion of WH and to establish networks for this in the future. - There is a special relevance for WHS education in highlighting awareness of heritage leading to reflection on identity, appreciation of diversity and leading in turn to increased respect for our own and other countries' cultures and care for heritage.
87	- There is a need for a centralised system of promotion, such as a website.
88	-
89	- Publicise nationally and locally what we have and its historical, aesthetic and cultural significance.
90	-
91	Ditto 31
92	-
93	- The role of WHSs as key assets needs to be further promoted, especially at the level of national and regional funding bodies that national, regional and local development agencies.
94	- Improved understanding by managers, planning authorities and local people, of what is required under the WHC, and greater commitment by HMG are urgently needed.
95	-
96	-
97	-
98	-
99	- Require a greater degree of consistency in promotion at a national level
100	- Need to enhance the website, including a subsection specifically aimed at students.

	<ul style="list-style-type: none"> - Need a joint strategy for WH education, with support from the Government, particularly in the form of project funding and profile raising. - Strong links to issues of Citizenship as taught in the National Curriculum
101	-
102	<p>There should be</p> <ul style="list-style-type: none"> - support from heritage agencies, government and other stakeholders to ensure that all Sites are promoted consistently and effectively - greater emphasis on locally-based activities, particularly support for community involvement - greater inclusion of WHSs and other heritage issues in school curricula.
103	<p>There should be</p> <ul style="list-style-type: none"> - creation of networks (for instance through the Cultural Olympiad) - practical steps to ensure that all Sites are promoted consistently and effectively - greater inclusion of WHSs and other heritage issues in school curricula.
104	-
105	-
106	<ul style="list-style-type: none"> - A marketing plan should be developed to benefit from inscription, raise awareness, increase participation in protection and presentation, and increase pride and local identity. - There should be an enhanced WHS Education Plan that provides a clear route to creating resources to enhance opportunities in life-long learning and which recognises the specific contribution a Site makes and its international links.
107	-
108	-
109	-
110	-
111	-
112	-
113	<ul style="list-style-type: none"> - There is work to be done to raise WH awareness, but measures proposed in the paper are already being addressed through the LAWHF

	<ul style="list-style-type: none"> - There should be a comprehensive approach to education with linked interpretation and education strategies in order to maximise benefits. - The Jurassic Coast's UK wide project to help develop strategies and programmes should be encouraged and properly resourced.
114	-
115	-
116	<ul style="list-style-type: none"> - A kit similar to the UNESCO "World Heritage in Young Hands" material should be developed for adult and family audiences. - UNESCO or DCMS should develop a strategy which takes into consideration marketing, promotion and education for all ages. - Any new education strategy should develop work around the theme of Human Coexistence with the Land. - There should be a more "joined-up" approach to the development of education opportunities for adults at WHSs in the UK, with its receiving higher status in the nomination and monitoring processes.
117	-
118	<ul style="list-style-type: none"> - Would like to see some of the lesser known WHSs being encouraged and funded to provide greater access to and information about the Site and raise awareness at a national level. - Awareness at a local level is often high: better coordinated national promotion is needed.

APPENDIX 6: TYPE OF RESPONSE

	Indiv.	Org.	Type of respondent	Model letter used?	Associated with site?	Proposed a site
1	✓		Not known	No		Glastonbury and Wells Somerset Moors and Levels
2		✓	WH Steering Group	Yes	Chatham Dockyard and its Defences	Chatham Dockyard and its Defences
3		✓	House-building company	No		
4	✓		Not known	No		Upper Heyford
5	✓		Not known	No		Flow Country
6		✓	City museum	No		Transnational site: London Docklands/ west Africa/ Bahamas
7	✓		Not known	No		Machair and beaches of the Western Hebrides
8	✓		Not known	No		Flow Country
9		✓	Tourism organisation	-		
10		✓	City council	-		
11	✓		Archaeologist	No		
12		✓	Cultural organisation	Yes	Lake District	Lake District
13		✓	British army, heritage branch	Yes (see 2)	Chatham Dockyard and its Defences	Chatham Dockyard and its Defences
14	✓		Academic	Yes (see 12)	Lake District	Lake District
15	✓		MP	No	Lake District	Lake District
16		✓	Friends organisation	Yes (see 12)	Chatham Dockyard and its Defences	Chatham Dockyard and its Defences
17		✓	County archaeological trust	No		

18		✓	City civic trust	No		Chester Rows
19		✓	Local heritage trust	Yes (see 2)	Chatham Dockyard and its Defences	Chatham Dockyard and its Defences
20		✓	Sport and leisure umbrella organisation	No		
21	✓		MP	No	Lake District	Lake District
22	✓		MP	No: this was a covering letter directing the reader to a briefing note	Lake District	Lake District
23		✓	Lottery organisation	No		
24		✓	UK WHS	No		
25		✓	British army	No	Chatham Dockyard and its Defences	Chatham Dockyard and its Defences
26	✓		Architect	No		Letchworth Garden City Joddrell Bank
27		✓	Heritage charity	No		Chatham Dockyard and its Defences Lake District
28		✓	National civic organisation	No		
29		✓	City Shadow Authority	No		
30		✓	City council	No		
31		✓	Naval trust	Yes, in part	Portsmouth	
32		✓	Regional organisation	No	Black Country and Birmingham Canals	Black Country and Birmingham Canals
33		✓	District council	No	Shakespeare's Stratford	Shakespeare's Stratford
34		✓	WH steering group	Yes, in part (see 31)	Lake District	Lake District

35		✓	Management partnership, TL site	No	Flow Country	Flow Country
36		✓	WHS trust	No	Ironbridge	
37		✓	Local council	No	Chatham Dockyard and its Defences	Chatham Dockyard and its Defences
38		✓	Development trust	Yes (see 12)	Lake District	Lake District
39		✓	National park authority	No	Cairngorms	Cairngorms
40		✓	National WH organisation	No		
41		✓	City civic society	Yes, in part (see 40)		
42		✓	National museum	No		
43		✓	NDB for heritage	No		
44		✓	UK WHS	No		
45		✓	UK WHS	No		
46		✓	Heritage park	No	Chatham Dockyard and its Defences	Chatham Dockyard and its Defences
47		✓	National royal commission	No	The spiritual landscape of St. David's Head Parys Mountain copper mines The international slate industry	The spiritual landscape of St. David's Head Parys Mountain copper mines The international slate industry
48			Duplication - see 75			
49		✓	UK branch, international heritage body	No		Lake District Chatham Dockyard and its Defences
50		✓	UK body advising UN agency	Yes (see 43)		
51		✓	UK Govt ministry	No	Portsmouth	
52		✓	Wildlife charity	No	The Flow Country The Wash and North Norfolk	The Flow Country The Wash and North Norfolk The New Forest

					The New Forest The Chagos archipelago South Georgia St. Helena	The Chagos archipelago South Georgia St. Helena
53		✓	County council	Yes (see 12)	Lake District	Lake District
54		✓	National architectural heritage society	No		Forth Rail Bridge
55		✓	City council	No	Birmingham Jewellery Quarter	Birmingham Jewellery Quarter
56		✓	Industrial archaeology group	No		
57	✓		MP	No		Arbroath Abbey
58		✓	Museums group	No	Wearmouth and Jarrow	
59		✓	City council	No		
60		✓	UK WHS	No	Avebury	
61		✓	Heritage organisation	Yes, in part (the section opposing the requirement for TL sites to reapply)		Lake District
62		✓	National Park authority	Yes (see 12)	Lake District	Lake District
63		✓	Railway authority	No	Great Western Railway Forth Bridge	
64	✓		MP	No		
65		✓	City authority	No		
66		✓	Local trust	No	Port Sunlight	Port Sunlight
67		✓	Town planning organisation	No		
68		✓	Historic buildings organisation	No		

69		✓	Natural heritage organisation	No	Heart of Neolithic Orkney St. Kilda Antonine Wall	
70		✓	UK WHS: natural	Yes, in part (see 113)	Jurassic Coast	
71		✓	Antiquarian society	No		
72		✓	RDA Tourism authority	No	Lake District	Lake District
73		✓	Urban development and environment	No	Tower of London	
74		✓	Conservation group (OT)	No	Chagos Archipelago	Chagos Archipelago
75		✓	Heritage organisation	No	St. Kilda Antonine Wall Old and new Towns of Edinburgh	
76		✓	Rural affairs organisation	No		
77		✓	Geoconservation organisation	No		
78		✓	Nature organisation	No	Jurassic Coast	
79		✓	County Council	No		Somerset Levels and Moors
80		✓	Tourism organisation	No	Chatham Dockyard and its Defences	Chatham Dockyard and its Defences
81		✓	Businesses and landowners organisation: 36,000 members	No		
82		✓	UK WHS	No		
83		✓	City council	No		
84		✓	County archaeology and natural history society	No	Avebury and Stonehenge	
85	✓		Consultant in the management and promotion of the historic	No		Chatham Dockyard and its Defences Lake District

			environment			
86		✓	National educational charity dealing with archaeology and the historic environment	No		
87		✓	National antiquarian society	No		
88		✓	City Council	No	Mercantile Liverpool	
89	✓		not known	No		
90	✓		Ex Chairman of English Heritage	No		
91		✓	Local heritage society	Yes, in part (see 31)	Portsmouth	Portsmouth
92	✓		not known	No		Dickens marshes Pegwell Bay Ramsar Site
93		✓	Key stakeholders of a WHS	No	Durham	
94		✓	Society associated with a WHS	No	Avebury	
95		✓	Forestry organisation	Yes (see 12)	Lake District	Lake District
96		✓	Local conservation association	No	Chatham	Chatham Dockyard and its Defences
97		✓	Architectural association	No		
98		✓	WH Steering Group for a potential WHS	No	York	York
99		✓	District Council	No	Great Western Railway	
100		✓	City conservation group in a WHS	No	Bath	
101	✓		Lecturer in 'Sustainable Uplands'	No	Lake District	Lake District
102		✓	National archaeological	Yes		

			organisation			
103		✓	National archaeological organisation	Yes (see 102)		
104		✓	Regional development trust	Yes (see 12)	Lake District	Lake District
105		✓	County council	No	Stonehenge and Avebury	
106		✓	Local heritage trust	No	Cresswell Crags	
107		✓	Overseas Territories conservation group	No	Gough and Inaccessible Islands Henderson Island Old Town St. George, Bermuda South Georgia Chagos Archipelago St Helena Grand Turk/Salt Cay	South Georgia Chagos Archipelago St Helena Grand Turk/Salt Cay
108		✓	International nature conservation group	No		South Georgia Chagos Archipelago
109		✓	OT Government	No		
110		✓	Borough Council Head of Regeneration	Yes (see 101)	Lake District	Lake District
111		✓	County cultural development body	Yes(see 101)	Lake District	Lake District
112		✓	County association of local councils	Yes (see 101)	Lake District	Lake District
113		✓	County council	Yes, in part (see 70)	Jurassic Coast	Lake District Chatham Dockyard and its Defences
114		✓	Regional Development Agency	Yes (see 72)	Mercantile Liverpool Lake District	Lake District
115		✓	Cultural organisation	Yes (see 12, 61, 104)	Lake District	Lake District

116		✓	National educational charity	No		
117		✓	WH bid project	No	Lake District	Lake District
118		✓	International consulting company	No		

APPENDIX 7: SUPPORT FOR CURRENT TENTATIVE LIST SITES

Tentative List site	Support	Against	Comments
Chatham Naval Dockyard	✓✓✓✓✓✓✓✓✓✓		
The Lake District	✓✓✓✓✓✓✓✓✓✓ ✓✓✓✓✓✓✓✓✓✓ ✓✓✓✓✓	✓	- The vote against expressed concern about negative implications of inscription on development.
Manchester, Trafford and Salford		✓✓(✓✓✓)	- All expressed concern about negative implications of inscription on safety, performance, development and innovation. (Red ticks indicate three organisations mentioned in 63 as having the same view, but which did not themselves reply to the consultation.)
The New Forest	✓		Withdrawn?
Great Western Railway	✓	✓	- Concern about negative implications of inscription on safety, performance, development and innovation - Cost of inscription would outweigh benefit
Shakespeare's Stratford	✓		
Wash and North Norfolk Coast	✓		
The Cairngorm Mountains	✓		
The Flow Country	✓✓✓✓		- Meet the criteria set out - Could bring both conservation and economic benefits - Very few WHSs refer to a Peatland habitat, let alone blanket bog NB general importance of wetlands.
The Forth Rail Bridge	✓	✓	- The vote against expressed concern about negative implications of inscription on safety, performance, development and innovation - Cost of inscription would outweigh benefit

Mount Stewart Gardens			
Fountains Cavern, Anguilla			
The Fortress of Gibraltar			

APPENDIX 8:

PROPOSALS FOR NEW SITES

Mainland UK

Non-TL site	Support (may be more than one site per response)	Reasons
Wells	✓	None given
Glastonbury	✓	None given
Upper Heyford Airfield	✓	Cold War history which could potentially have affected the history of the world
Machair and beaches of the Outer Hebrides	✓	Environmental; integrity, beauty
Chester Rows	✓	Poorly represented category of WH Site in the UK: "living culture"
Birmingham Jewellery Quarter	✓	
Portsmouth Harbour, Spithead and Isle of Wight	✓✓	Should be inscribed as the world's first "cultural seascape". Willing to have an application ready by July 2009.
Letchworth Garden City	✓	Inspiration for Garden Cities throughout the world
Jodrell Bank	✓	Representative of important advances in 20th century science, and inspirational for a post-war generation
Port Sunlight	✓	Finest surviving example of early urban planning in the UK Almost completely intact
Somerset Levels and Moors	✓	Represent a strong and cost-effective candidate for the WH Cultural Landscape category, with widespread local support.
"Dickens' marshes", to be included in Chatham Dockyard and its Defences	✓	None given
Pegwell Bay Ramsar site	✓	
York	✓	None given

Black Country and Birmingham Canals	✓	Unique place in the history of the Industrial Revolution; unique geological diversity and concentration of iron ore, coal and limestone together with the presence of early innovators; Newcomen steam engines; development of steam power by James Watt.
The spiritual landscape of St. David's Head	✓	Represents an indigenous cultural process, unlike the existing Welsh WHSs
Parys Mountain copper mines	✓	Represents an indigenous cultural process, unlike the existing Welsh WHSs
Arbroath Abbey	✓	With the signing of the Declaration of Scottish Independence in 1320, became the founding site for the development of democracy in Europe and other areas of the world: a counterpoint to more militaristic and colonial monuments on the lists.

Overseas territories and Crown Dependencies

Non-TL site	Support (may be more than one site per response)	Reasons
St. Helena	✓	Natural and cultural site: already discussed informally
Chagos Archipelago Conservation Area	✓✓✓✓	Natural site
Grand Turk/Salt Cay	✓	Natural and cultural site: already discussed informally
South Georgia	✓✓✓	Natural site

Transnational sites

Non-TL site	Support (may be more than one)	Reasons
-------------	--------------------------------	---------

	site per response)	
Museum of London Docklands/ west Africa/ Bahamas	✓	Proposed site will reflect the mass movements of peoples and the transfer of culture
Cornish Mining transnational serial nomination	✓	None given
The international slate industry	✓	Represents an indigenous cultural process, unlike the existing Welsh WHSs