

Written evidence submitted by World Heritage UK [FPS 046]

Submission to the House of Commons Committee Housing, Communities and Local Government Committee

1. World Heritage UK (WHUK) is an independent charitable body that represents the UK's collection of World Heritage Sites. Those in England are listed in Appendix One below. It is at the heart of the UK World Heritage community and is the only body which is focused on representing and promoting all of the UK's World Heritage Sites.
2. WHUK has submitted a full response concerning the Planning White Paper to the Secretary of State. The response has been written in consultation with all the Site coordinators. It can be found on WHUK's website <https://worldheritageuk.files.wordpress.com/2020/10/whuk-response-to-planning-white-paper-2020-final-1-4.pdf>
3. The key message from WHUK and the reason for this submission is that the introduction of a new planning system provides a unique opportunity to secure proper recognition of World Heritage Sites by legislating to give existing and any future Sites a statutory status.

The Importance of World Heritage

4. We believe that the UK's World Heritage is a remarkable opportunity – a sleeping giant of cultural and economic potential. It includes the most important international heritage assets in the country, objectively identified, assessed and inscribed by UNESCO. Simply put the Sites are amongst some of the most important places for human culture, science and the natural environment on the surface of the earth. Collectively the UK Sites spell out our island story, capturing Britain's greatest global impacts whilst offering important local benefits and a sense of pride to WHS communities, many of which are in relatively poor and peripheral parts of the country. WHUK has carried out the first comprehensive and professional review of the UK sites, in cooperation with site owners, managers, local authorities and others. Our review, *UK World Heritage: Asset for the Future*, was published in 2019 and is available here <https://worldheritageuk.files.wordpress.com/2019/12/90050100-main-r-f-2019-12-04-lr.pdf>
5. Government has an international treaty responsibility to protect, preserve and pass on to future generations our World Heritage. With appropriate management the Sites will remain, and in some cases become, the crown jewels of heritage tourism, whilst contributing to the development and projection of UK soft power.
6. The sites are therefore a central component of the UK's (and the world's) cultural inheritance. They are often places of great beauty, and always of powerful identity and character, in both urban and rural contexts. They deserve to be protected and cherished by our planning system.

A Challenge for the Planning System

7. Handling the planning issues posed by World Heritage Sites has not always been easy. Liverpool has been placed on the World Heritage at Risk list by UNESCO, following approval of a £5 billion speculative development project, including very tall buildings, which is part within the World Heritage Site and part within the buffer zone. Liverpool may be the best known issue but it is not alone. There have been contentious planning proposals at the Palace of Westminster, the Cornish

Mining Landscapes, Bath, Stonehenge, the Royal Botanic Gardens, Kew and Derwent Valley Mills, for example, some of which have been matters of serious concern for UNESCO.

8. The Secretary of State for Culture, Media and Sport, and advisor Historic England, is responsible for World Heritage Sites. The Secretary of State for Housing, Communities and Local Government and the local planning authorities are responsible for planning policy and planning decisions affecting World Heritage Sites. Planning is one of the key tools with which the UK fulfils its requirement to protect, preserve, present and transmit to future generations these Sites.

9. However there is no clear statutory recognition for the Sites in the planning system. It is a surprising fact that whilst there are many statutory national planning designations for areas of environmental, natural or landscape significance – such as Areas of Outstanding Natural Beauty, National Parks, National Nature Reserves and Sites of Special Scientific Interest – there is no equivalent for sites of national, let alone international, cultural or heritage significance.

10. Some World Heritage Sites, such as the recently designated Lake District, happen to coincide with environmental designations in rural areas. But an urban World Heritage Site, like Saltaire near Bradford for example, has no such statutory place protection, beyond its Conservation Area status. Conservation Areas, introduced in the 1967 Civic Amenities Act are the UK's principal statutory designation for places of cultural and heritage significance. They are essentially local designations. There are almost 10,000 Conservation Areas and all enjoy the same level of statutory protection, without distinguishing places of national and international importance from places of merely local interest. In our view this is a serious policy gap and which deserves to be rectified.

Planning for three types of area and World Heritage

11. WHUK fully understands the Government's imperative to speed up and streamline the planning system and the thinking which underlies the Planning White Paper's proposal for the identification of three types of area: development areas, renewal areas and protected areas. In most parts of the country such a system could doubtless be made to work.

12. Yet we doubt whether the system will work for World Heritage Sites which are simultaneously important and heterogeneous. They include remote places, internationally significant geology and geomorphology, beautiful rural landscapes, places of scientific importance, historic monuments and archaeology. These might be appropriate for protected area status. But they are also located in very busy town and city centres, like Bath and the Tower of London, sometimes in places which urgently need investment and regeneration, like Liverpool, as well as smaller urban places, like Saltaire or the Derwent Valley. Not all these places might be suitable for blanket protected area status.

The Case for Special Recognition

13. In short World Heritage Sites need very special recognition in planning policy. We believe that the Planning White Paper process provides a unique opportunity to secure such recognition by legislating to give existing and any future Sites a statutory status within the planning system. The legislation would apply within England and the devolved administrations could be invited to replicate the legislation in their own jurisdictions, to secure consistency across the whole of the UK.

14. Such an approach would offer several advantages. It would clarify the role and responsibilities of the Secretary of State for Communities, Housing and Local Government in protecting and developing policy for the Sites. It would send a clear message to local planning authorities and others,

potentially strengthening the position of the non-statutory World Heritage Site management plans. It would send a positive message to UNESCO, underlining the UK's determination to uphold its international treaty obligations. It would help to increase the profile of World Heritage Sites and could encourage further consideration of their national significance and resourcing.

15. Not least it would send out the powerful message that government wants to protect and enhance our heritage and places of very special beauty and cultural significance, and that, for the first time on record, in the Planning White Paper process, Government will be taking forward this long overdue reform.

16. The content of the legislation could include a statement of how Sites should be treated in the new planning system and a requirement for the production of management plans and the proper management of Sites. It might also include a commitment to prepare a national World Heritage Site Vision and Strategy.

17. We should be very pleased to take part in discussion to help develop our proposal.

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Appendix One: List of Inscribed UK World Heritage Sites in England

Blenheim Palace
Canterbury Cathedral, St. Augustine's Abbey and S. Martin's Church
City of Bath
Cornwall and West Devon Mining Landscape
Derwent Valley Mills
Dorset and East Devon Coast
Durham Castle and Cathedral
Frontiers of the Roman Empire (Hadrian's Wall)
Ironbridge Gorge
Jodrell Bank Observatory
Liverpool – Maritime Mercantile City
Maritime Greenwich
Palace of Westminster and Westminster Abbey including St. Margaret's Church
Pontcysyllte Aqueduct and Canal (part in Wales)
Royal Botanic Gardens, Kew
Saltaire
Stonehenge, Avebury and Associated Sites
Studley Royal Park including the Ruins of Fountains Abbey
The English Lake District
Tower of London