

Please reply to Sue Davies, Chair Culture Committee, UKNC, c/o Wessex Archaeology, Portway House, Old Sarum Park, Salisbury, SP4 6EB ([s.davies@wessexarch.co.uk](mailto:s.davies@wessexarch.co.uk))

Caity Marsh  
Culture Team (World Heritage)  
Department for Culture, Media and Sport  
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24 February 2009

**By E-Mail only**

Dear Caity

**Response by the UK National Commission for UNESCO to “World Heritage for the Nation: Identifying, Protecting and Promoting our World Heritage – A consultation paper (2 December 2008)”**

**Introduction**

As you will be aware UNESCO is unique in the UN system in operating through National Commissions in its Member States. The UK National Commission’s role is as the Government’s principal advisor on all matters to do with UNESCO. It is an independent body, which acts as a focal point between UK Government, civil society and UNESCO. Its sponsoring department is the Department for International Development, but it works closely with other HMG departments including DIUS, DCMS, and the FCO as well as the Devolved Administrations. It acts as a partner to UNESCO in outreach to civil society, and works in partnership with Government and the UK Permanent Delegation to UNESCO in Paris. The UKNC comprises an overarching Board of Directors and four Sector Committees, including Culture. UKNC members are independent experts, appointed *ad hominem* in fields covering the range of UNESCO’s programme of activities. Amongst other matters (terms of reference attached for information), the UKNC’s Culture Committee holds a specific mandate:

- To advise and work with HMG on UNESCO’s cultural activities which have specific relevance to the UK including UNESCO requests and initiatives, Conventions, World Heritage Sites’ matters, and cultural education.

The Commission’s objectives include bringing together Government departments and agendas in working with UNESCO, building a more effective UNESCO, promoting recognition and awareness of UNESCO and its work in the UK and engaging young people with UNESCO’s aims and ideals. The UKNC views World Heritage Sites as key focal points and catalysts for change on a truly global scale focusing on people and their environments. Such globally-recognized sites

- provide opportunities for international co-operation, developing and sharing good practice, and for capacity-building
- act as drivers for managing sustainable change, including community participation in managing change and developing public support for conservation
- act as focal points for standard-setting, including informed, consistent and balanced decision-making
- act as focal points for developing sustainable communities, promoting diversity and enhancing cultural understanding
- provide opportunities for education, access and learning
- provide a platform for improving public awareness and understanding of UNESCO’s goals and objectives
- should act as exemplars in management policy, practice and procedures.

The UKNC (Sue Davies, Chair Culture Committee) participated in the Review as a member of the Steering Group.

## General observations

The UK National Commission is very pleased to have the opportunity to comment on this important and timely review. We welcome the consultation and were pleased to see a substantive report, given the resources available to produce such an important document. We feel that cultural heritage matters in general deserve more policy muscle at the centre of Government.

The document is a good first step in understanding the benefits and costs of World Heritage Inscription. There has been a dearth of reliable information on costs of WH status, and on its relationship to sustainable development and regeneration, economic and other benefits. However, the weight given to economic elements is high and may perhaps distort or diminish other aspects.

We understand the natural focus on the UK's World Heritage. However, we feel that perhaps an opportunity was missed to set the review in the broader context of UNESCO's goals and those of Government – to raise awareness in the broader public arena of those goals. The World Heritage Convention is one of the instruments that UNESCO promotes in seeking to attain its goals including sustainable development; it is not simply a conservation instrument. ( UNESCO's mission states "As a specialized agency of the United Nations, UNESCO contributes to the building of peace, the eradication of poverty, sustainable development and intercultural dialogue through education, the sciences, culture, communication and information".)

In previous correspondence with the former Minister, the Commission was particularly pleased to see reference of a return to the original spirit of the Convention and its focus on international co-operation. We feel that World Heritage 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. These internationally-agreed overarching and strategic objectives should be reflected in Member States' policy, procedural and management approaches to World Heritage sites, down to the level of individual sites where practicable. We do acknowledge that the review makes reference to some of these points but feel that perhaps they could have featured as a more central strand. We would have liked to see a slightly stronger emphasis on this and on working cross-department particularly with the DFID.

## Specific Questions

**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 (preferred option); and/or*
- *Consider alternative designations such as a National Heritage List or the European Heritage label.*

The UKNC strongly supports Option iii (shorter and more focused list and two-stage application process; consultation paragraph 5.4 ff). We consider that this reflects both the need to address the global imbalance in the range and locations of inscribed properties and provides an opportunity to contribute to UNESCO's and the UK Government's aims. For example, funding released by periodic nominations rather than annual ones, could be used to help developing countries. An example of this might be for the Hadrian's Wall WHS to help other parts of the Frontier site to develop their nominations and management practices. Slowing the rate of nomination would not diminish the UK's overall support for the Convention, but might enhance it.

The Commission would not support the simple carrying forward of the current Tentative List to use as the basis for a short and focused List. Periodic review should allow for the removal of sites from the Tentative List – for example those that do not fulfil the new criteria and definitions of Outstanding Universal Value, as well as additions. Any system must allow for changing perceptions of significance and new research and information. The UK, its Overseas Territories and Crown Dependencies still hold cultural and natural assets worthy of Inscription. In drawing up a shorter and more focused List we would encourage Government to consider a thematic approach perhaps focussing on science and

technology, on natural sites in its Overseas territories and on the continuing development of trans-national nominations. The legacy of sport might also merit consideration, and would be appropriate given 2012 and the opportunities provided by the Olympiad. We would like to see an imaginative list which will inspire people, raise awareness and adhere to the new world heritage values.

A two-stage application along the lines suggested in section 5 is eminently sensible. Whilst the enthusiasm with which some sites are supported is understandable, it is clear that there is not a sufficiently clear public understanding of Outstanding Universal Value and what it means in reality, nor of the reality of the nomination and management process, leaving aside how such sites might be used to achieve the greater goals of *the building of peace, the eradication of poverty, sustainable development and intercultural dialogue through education, the sciences, culture, communication and information*. We would recommend strengthening the fourth bullet point in paragraph 5.13 in order to make it clear that this relates to UNESCO's and Government's wider goals. We would also commend clear guidance on an enhanced web site for those wishing to promote the nomination of their chosen sites.

If this option is adopted the Commission would recommend that a flexible timetable for nominations is considered, rather than a more rigid timetable for submission. Whilst deadlines should be met and enforced, Nomination and management documentation needs to suit individual site requirements, and the necessary time for this will vary. In any event the Commission would suggest that a UK nomination not more frequently than every three to four years should be considered. The UK List is also heavily biased towards England, and it might be appropriate to consider reducing nominations for England to a larger interval, perhaps no more than every 10 years.

The Commission does not consider either of the first two options to be viable. The existing List should be reviewed in the light of developments over the last ten years and new guidance. Some sites have already indicated they do not wish to go forward. To suspend nominations for a period might be very laudable, but is unlikely to be an example followed by other member states and it would not be in the UK's best interests to act alone and lose out on potential benefits.

The Commission does not feel that the introduction of a new 'National Heritage List' would be helpful. This would seem to run contrary to creating a simpler and more holistic heritage protection regime and could be divisive or undermining of assets not on the list. We would, however, welcome more 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.

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

The Commission welcomes recent measures to strengthen and embed World Heritage Sites within the planning system (draft planning circular *et al.*), but would also like to see a specific duty to have special regard to WHS in exercising planning functions across the UK. This could be taken forward in the Heritage Protection Bill if it (proceeds), or in some other legislation in England & Wales, Northern Ireland and Scotland.

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. The Commission was pleased to see reference to this in the Review and looks forward to seeing this develop. Both Westminster and the Devolved Administrations have much to offer, and that applies to other organisations and agencies as well. For example, the UKNC has benefited from studies carried out in Scotland and Wales on Intangible Heritage, which can be drawn on when looking at England and Northern Ireland.

The Commission would commend a UK-wide strategy for promoting World Heritage Sites, with central Government taking a more proactive line in encouraging greater appreciation of issues as well as promoting standards of conservation, best practice and so on. The 2012 Olympiad provides a hook on which to hang promotional developments, create networks and raise awareness, and World Heritage Sites should be encouraged to take a lead here with a range of local and regional activities. The year also coincides with the 40<sup>th</sup> Anniversary of the World Heritage Convention.

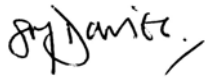
Greater integration of learning, access and education strategies within WHS management would be an area to develop and promote centrally across the UK, and we would like to see consideration of issues relating to World Heritage and UNESCO better addressed within the national schools' curricula.

The Commission supports the suggestion of an improved web site focusing on World Heritage. The use of digital technology is and will become increasingly important in all aspects of education and promotion, and the quality of the web site will be critical. We recognise that this will require proper resourcing to develop, maintain and enhance the web site, but it is a very cost-effective method which could bring substantial public benefit, and would be an appropriate use of public funds.

Appropriate levels of funding apply to whatever option or route is chosen to take forward. There are many demands on the public purse at a critical economic time, but there are potential economic and other benefits from investing a sound and robust system of managing and promoting the UK's World Heritage well.

The DCMS and its partners having invested in a major Review and developed considered proposals, the UK National Commission for UNESCO looks forward to seeing the implementation of a policy and approach which sustains the good reputation of the whole UK in not only conservation management but also sustainable development, education and other areas. The Commission is pleased to note the panel to be tasked with developing more focused priorities set out in paragraph 5.19, and confirms its willingness and ability to help in any way it can.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sue Davies' with a stylized flourish at the end.

**Sue Davies OBE FSA HonMIFA  
Chair, Culture Committee  
UK National Commission for UNESCO**



United Nations Educational,  
Scientific and Cultural Organization

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### CULTURE COMMITTEE

#### TERMS OF REFERENCE

1. To be the formal link between civil society, relevant departments in Her Majesty's Government (primarily the Department for Culture, Media & Sport) including the Devolved Administrations and UNESCO on matters relating to all aspects of culture. Specifically, to co-ordinate civil society's culture-sector contribution to the biennial UNESCO general conferences, UNESCO conventions, and to UK policy on UNESCO's programme in the culture sector.
2. To promote recognition and awareness of and participation in UNESCO's cultural work, and to promote the work of UNESCO as an organization where all countries can learn from each other.
3. To participate, as appropriate, in UNESCO's early development of initiatives for cultural activities.
4. To advise and work with HMG, particularly the Department for Culture, Media & Sport, on UNESCO's cultural activities which have specific relevance to the UK (including the Devolved Administrations), including UNESCO requests and initiatives, Conventions, World Heritage Sites' matters, and cultural education.
5. To provide independent and expert analysis, comment and advice to HMG on cultural matters relating to UNESCO, including as input to UK (including the Devolved Administrations) policy-making on key UNESCO programmes and cultural issues.
6. To advise HMG on ways of raising awareness of UNESCO's cultural work in the UK across the whole of civil society, but in particular in the UK culture sector.
7. To encourage and facilitate the use of UK cultural expertise around the world, especially within developing countries.
8. To establish links with other National Commission Culture Committees of UNESCO Member States, to share and receive appropriate knowledge and research.
9. To undertake such actions as would enhance culture internationally.

26 August 2005