

**RTPI**

mediation of space · making of place

Royal Town Planning Institute
41 Botolph Lane
London EC3R 8DL
Tel +44(0)20 7929 9494
Fax +44(0)20 7929 9490

Email online@rtpi.org.uk
Website: www.rtpi.org.uk

Registered Charity Numbers
England 262865
Scotland SC 037841

Patron HRH The Prince of Wales KG KT PC GCB

22 August 2008

Phil Weatherby,
PSI, Zone 1/G10,
Eland House,
Bressenden Place,
London
SW1E 5DU

Email response sent to: phil.weatherby@communities.gsi.gov.uk

Dear Mr Weatherby,

RESPONSE TO CONSULTATION PAPER: PROTECTION OF WORLD HERITAGE SITES

Thank you for the opportunity to respond to the above consultation. The RTPI is a membership organisation representing over 21,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public as a whole. It has over 21,000 members who serve in government, local government, academia and as advisors in the private sector. Many spatial planners are closely involved in the development of policy for and the management of World Heritage Sites. This response was drafted following an internal consultation.

The White Paper Heritage Protection for the 21st Century, published in March 2007, was broadly welcomed by the RTPI, IHBC and RICS for its commitment to simplifying and clarifying heritage systems within the United Kingdom. The Government gave a commitment in the White Paper to produce a planning circular which would 'further recognise in national policy the need to protect World Heritage Sites as sites of outstanding universal value'. We feel the Draft Circular 'Protection for World Heritage Sites' does consolidate and build upon the information contained within the White Paper on World Heritage Sites, however we do have a number of concerns that are outlined below.

The Planning Circular

The RTPI recognises that a significant threat faced by World Heritage Sites in England is that of inappropriate development, which can, even if only of a comparatively minor nature, cumulatively have a significant adverse effect on the outstanding universal value of a World Heritage Site.

We welcome the inclusion of updated policy guidance on the level of protection and management required for World Heritage Sites in England. This replaces current advice in paragraphs 2.22, 2.23 and 6.35 to 6.37 of Planning Policy Guidance 15 Planning and the Historic Environment. However, whilst the Draft Circular seeks to embed protection of

World Heritage Sites within the spatial planning process, we are concerned that by continually amending the Planning Policy Guidance paragraph by paragraph, the guidance will become fragmented and disjointed. We therefore advocate that a new Planning Policy Statement be drawn up as soon as possible to replace PPG 15 which, published in September 1994, is now considerably out of date.

We welcome the inclusion of a draft Statutory Order in the planning Circular, which adds World Heritage Sites as Article 1(5) land, offering the basic protection from some forms of inappropriate development as should be expected for sites of such outstanding international importance; however we would suggest that sites acknowledged as being of 'outstanding international importance' be given a higher status than other designated areas.

Whilst the draft discusses the need to protect the setting of World Heritage Sites, with much emphasis placed on Buffer Zones, there is a lack of clarification of World Heritage Site boundaries within the Draft Circular or Guidance Note. A good example of this is the City of Bath World Heritage Site, where there is some confusion as to the precise boundary of the site. We question whether a World Heritage Site with an unclear boundary can have a Buffer Zone allocated to it, or a robust Management Plan constructed for it, when there is no real consensus as to where the site begins and ends.

The RTPI believes in integrated spatial planning and we recognise that the planning system in England requires maximum use to be made of statements of national and regional policy with minimum duplication at the local level. It is therefore imperative that World Heritage Sites be fully integrated within Local Development Frameworks, and specifically within Development Plan Documents (DPD), which should inform Management Plans. The Draft Circular mentions the need for World Heritage Sites to be included within Environmental Impact regulations. However Strategic Environmental Assessments are only mentioned in conjunction with Management Plans. The inclusion of World Heritage Sites within DPD policy would make it necessary for World Heritage Sites to be included in the Strategic Environmental Assessment process. We would also like to see Buffer Zones included in this process.

English Heritage Guidance Note

The RTPI also welcomes the addition of detailed expert guidance on the protection and enhancement of World Heritage Sites provided by English Heritage.

We agree that local authorities, as well as being responsible for spatial planning in their areas, play a key role in the management and promotion of tourism of World Heritage Sites, but we would like to see much more emphasis be placed on the conservation role local authorities play within the spatial planning system.

The Guidance Note briefly mentions the Local Authority World Heritage Forum, an important network for local authorities within the UK that have the whole, or part of a World Heritage Site within their boundaries. More information on the forum, for example a website address and details of how often they meet and so on would be useful.

We would suggest paragraph 6.12, which defines the conservation process, should be included in the 6 principles set out in the Guidance Note, and would go as far as suggesting that this should also be included in all Management Plans. The title *Conservation* Management Plan, rather than just Management Plan, is perhaps more appropriate for documents relating to the conservation and management of World Heritage Sites.

We are concerned, however, with paragraph 7.9, which we feel should be reworded: change can also have a damaging or detrimental effect upon the Outstanding Universal Value of World Heritage Sites. As the objective of this document is the protection of World Heritage Sites, the last sentence should be extended to ensure that developments incapable of suitable modification to protect the Outstanding Universal Value should be rejected. Whilst we recognise that change

may be unavoidable, it is imperative that change is managed, not just planned and that competing uses should be reconciled as far as possible.

Much of the Guidance Note explains the role of Management Plans and how they function. Mention is made in paragraph 9.7 of the need for Management Plans to have a 'vision' for the site, with long term aims looking forward 30 years and policies for five years. More detail could be given on how Management Plans will be monitored and who will monitor them, and how comprehensively they will be reviewed.

A paper copy of this consultation will also be sent by post. If you require any further assistance, please contact Anna Morecombe, Planning Policy Officer on 0207 929 9493 or email policy@rtpi.org.uk .

Yours sincerely,

Rynd Smith
Director Policy and Communications
Tel: 0207 929 9494