



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

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Dear Sirs

**WORLD HERITAGE FOR THE NATION: IDENTIFYING, PROTECTING AND PROMOTING OUR WORLD HERITAGE**

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation.

The Institute supports World Heritage status as a vehicle for the conservation of the Nation's most precious heritage assets. It is right, therefore, that a review of the process for designation should be undertaken particularly as there has been a 10-year period since the last review. We also support the World Heritage Committee's commitment to a broader representation on the World List in both national representation and heritage types.

The Institute believes that there should be a strengthening of planning controls and management arrangements for existing sites and is pleased that new guidance on these is proposed shortly. This should not be at the expense of a review of the policy for the management of WHS which is also badly needed. The Institute was particularly interested to see the results of the PwC study which we think will very useful to prospective bidders.

Our responses to the questions posed in the consultation are as follows.

**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?

**Answer:** The Institute favours an approach based on option 3. It seems to us that there is little point in many possible schemes being progressed when only a few will have the opportunity of designation. We think the view expressed at paragraph 5.5 is likely to be correct and that some tentative sites already on the list will fall out of the running immediately.

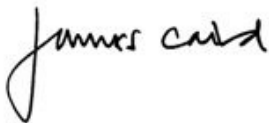
- Proposers of the current tentative bids should be asked to review their bids in the light of this evidence to insure that all current bids are active and realistic. The Institute thinks that a combination of this and the the 2-stage reapplication process that will follow will avoid a great deal of the abortive work that otherwise might have occurred.
- However, we urge the Government not to change the current system for the devolved administrations set out in paragraph 2.4, in which candidates for the tentative list are nominated by their respective First Ministers.
- We are concerned that the disproportionate numbers of designations in England should be redressed. We think that this is likely to be better achieved by allowing nominations to the tentative list from First Ministers to proceed to the list on the basis of local scrutiny rather than the 2 stage process for existing proposals in England. Any procedure should allow for nomination and response to new categories of WHS designation in line with the objectives of the World Heritage Committee of UNESCO as and when they arise.
- Paragraph 5.19 of the Consultation Paper proposes that the next review is steered by a single panel chaired by English Heritage involving historic/cultural/natural representation from each devolved administration in order to achieve the aim of drawing up a shorter list. The Institute thinks it to be inappropriate for a process in which competing bids from the whole UK are assessed should be chaired by a body representing those in England alone. This would work contrary to devolved democratic arrangement already in place. The Institute is of the view that the process should be overseen by DCMS through an independent and/or UK-wide chair and that English Heritage should join Historic Scotland and CADW as national heritage advisors on the panel. Clearly ICOMOS-UK and ICUN UK should be consulted prior to making the final decision.
- The criteria for designation and the results of the recent PwC work on the costs and benefits of designation should be given wide publicity perhaps as part of the updated guidance mentioned in the consultation document. We think it important that WHSs are designated for their heritage value and not for their potential for regeneration. The PwC research is useful in understanding the issues involved.
- The Institute supports the European Heritage Label process as an alternative to WHS. We think that if EHL proceeds the UK should be seen to be part of it. It would give focus and wider significance to site that are unlikely to become WHS but for which there is local determination to management under international heritage best practice.

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

**Answer:** The Institute believes that in England there is a widening gap between the Government's aspirations for heritage protection as expressed through DCMS and actual commitment to delivering it through the CLG's stewardship of the planning system. We strongly urge the Government to instigate better cross-departmental working and understanding to remedy this problem as well as making available the necessary resources. This does not appear to be the case in the devolved administrations. Much of the heritage policy and guidance of both DCMS and CLG is sorely in need of revision. The Institute regrets the omission of the draft Heritage Bill from the legislative programme as this could have the effect of further delaying the production of policy and guidance in tune with current needs and practice. The proposed guidance on WHS will be welcome.

We would also welcome the establishment of a representative body, such as the existing one for AONBs, which could provide opportunities for shared experience and the formulation of best practice. Perhaps DCMS could promote this.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large, looping initial 'J'.

James Caird  
Consultant Consultations Co-ordinator