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Dear Mr Weatherby

Protection of World Heritage Sites - Consultation Paper Natural England response

Natural England welcomes the opportunity to comment on this consultation paper. Our response here should be read in conjunction with our previous response on the Heritage Protection in the 21st Century White Paper in 2007 and our current response on the proposed Heritage Protection Bill (enclosed).

Natural England welcomes the draft Protection of World Heritage Sites circular and guidance notes. Natural England supports the proposed strengthened planning and policy recognition given to World Heritage Sites at a regional and local level, the heightened emphasis given to the role of management plans and the function of surrounding buffer zones in relation to the protection and management of World Heritage Sites.

We are disappointed at the lack of enhanced protection for World Heritage Sites outside of the planning system, without which these areas will be unprotected against other incremental or detrimental change. Given that these designations reflect their global significance, Natural England remains concerned about a potential gap in the protection of WHS that has still to be addressed for matters that do not fall within the definition of 'development'.

World Heritage Sites encompass a range of interests of direct relevance to Natural England including biodiversity, geodiversity, landscape and the historic environment. We have a particular interest where there is an overlap between World Heritage Sites and conservation and landscape designations including Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Areas of Outstanding Natural Beauty (AONBs), Heritage Coasts and National Parks. We also have a specific interest in the Dorset and East Devon Coast World Heritage Site which is England's only natural World Heritage Site.

We note that the draft circular and guidance currently focuses primarily on the relationship between World Heritage Sites and the historic environment. It should also provide an opportunity to emphasise the diversity of interest within World Heritage Sites and to encourage a more integrated and supportive mechanism for managing and protecting World Heritage Sites. This aspect needs further development.

Natural England therefore makes the following recommendations:

1. There needs to be clear provision within the draft circular and guidance note for the Dorset and East Devon Coast World Heritage Site. The Dorset and East Devon Coast World Heritage Site is England's only natural World Heritage Site. The site encompasses 13 SSSIs, 2 NNRs, 3 SACs, 2 SPAs and 2 AONBs which provide the primary mechanism for its management and protection. Both the draft circular and guidance document are primarily focused on historic buildings and environment (for example, adding World Heritage Sites to Article 1(5) land) which have far less relevance to the management and protection of this World Heritage Site.

2. Clearer reference should be made to planning and policy guidance relevant to the natural environment, in particular, the Wildlife and Countryside Act, CROW Act, The NERC Act and Planning Policy Statement 9: biodiversity and geological conservation. This is particularly important for those cultural World Heritage Sites with overlapping conservation and landscape designations (see Annex 1)
3. The relationship between World Heritage Sites and the delivery of the European Landscape Convention (ELC) needs to be clarified. The UK is a signatory to the ELC and Natural England is the lead partner across England.
4. The relationship between Natural England, English Heritage, DCMS and Defra in relation to World Heritage Sites should be clearly defined as should the role of Natural England in relation to World Heritage Sites. For example, in relation to call in procedures how will English Heritage make decisions in relation to adverse impacts on the integrity of the Dorset and East Devon Coast World Heritage Site?
5. The Guidance note should be a joint note produced by English Heritage and Natural England to reflect the diversity of interests within World Heritage Sites.
6. In general, there needs to be a stronger emphasis on integrating the historic environment with biodiversity, geodiversity and wider landscape elements of World Heritage Sites. These are critical elements of their character, how they are managed and presented.
7. The adoption of an integrated approach to the protection and management of World Heritage Sites is also of importance to the IUCN and ICOMOS. Both are keen to encourage management approaches that take account of the reasons for inscription and the diversity of additional interests that sit with World Heritage Sites – all of which contribute to their 'sense of place'. The draft guidance and circular offer an opportunity, not realised in the current format, to emphasise the importance of this approach.

As part of this submission we would also recommend that we enter into direct dialogue with DCMS, Defra and English Heritage over Natural England's relationship with World Heritage Sites, in particular, how Natural England can provide appropriate support and guidance in the protection and management of World Heritage Sites.

To discuss this, or any other aspect of our response, please contact Dr Jonathan Larwood (Senior Specialist, Geology and Palaeontology) on 01733 455115 or jonathan.larwood@naturalengland.org.uk

Yours sincerely



Rob Cooke
Director Policy

Encl:

Natural England's response to the Heritage Protection White Paper, July 2007
Natural England response to the Draft Heritage Protection Bill, July 2008

Annex 1

Overlap of World Heritage Sites with Conservation and Landscape designations

World Heritage Site	SSSI	SAC	AONBs	SPA	NNR	H Coast	National Park
Blenheim Palace	BLENHEIM PARK						
City of Bath	COMBE DOWN & BATHAMPTON DOWN MINES NORTH ROAD QUARRY ROAD BATH	BATH & BRADFORD ON AVON BATS	COTSWOLDS				
Cornwall and West Devon Mining Landscape	AIRE POINT TO CARRICK DU CAMERON QUARRY CARRICK HEATHS CLIGGA HEAD CROW'S NEST DEVON GREAT CONSOLS GODREVEY HEAD TO ST AGNES GREAT WHEAL FORTUNE GREENSCOOMBE WOOD, LUCKETT HAYLE ESTUARY & CARRACK GLADDEN HINGSTON DOWN QUARRY & CONSOLS LOCKRIDGE MINE LOWER BOSTRAZE & LESWIDDEN PENBERTHY CROFT MINE PHOENIX UNITED MINE PORTHCEW ST AGNES BEACON PITS SYLVIA'S MEADOW TAMAR-TAVY ESTUARY TREGONNING HILL TREVAUNANCE COVE WEST CORNWALL BRYOPHYTES WHEAL GORLAND	GODREVEY HEAD TO ST AGNES LOWER BOSTRAZE & LESWIDDEN PHOENIX UNITED MINE & CROW'S NEST PLYMOUTH SOUND & ESTUARIES TREGONNING HILL	EAST DEVON CORNWALL	TAMAR ESTUARIES		PENWITH WEST AGNES	
Derwent Valley Mills	CROMFORD CANAL MASSON HILL MATLOCK WOODS SHINING CLIFF WOODS VIA GELLIA WOODLANDS	PEAK DISTRICT DALES					

Derwent Valley Mills Buffer Zone	CROMFORD CANAL GANG MINE MASSON HILL MATLOCK WOODS ROSE END MEADOWS SHINING CLIFF WOODS VIA GELLIA WOODLANDS	GANG MINE PEAK DISTRICT DALES					
Dorset and East Devon Coast	AXMOUTH TO LYME REGIS UNDERCLIFFS BUDLEIGH SALTERTON CLIFFS CHESIL BEACH & THE FLEET EXE ESTUARY ISLE OF PORTLAND LADRAM BAY TO SIDMOUTH OTTER ESTUARY PORTLAND HARBOUR SHORE PURBECK RIDGE (EAST) SIDMOUTH TO BEER COAST SOUTH DORSET COAST STUDLAND CLIFFS WEST DORSET COAST	CHESIL & THE FLEET ISLE OF PORTLAND TO STUDLAND CLIFFS SIDMOUTH TO WEST BAY ST ALBANS HEAD TO DURLSTON HEAD	DORSET EAST DEVON	EXE ESTUARY CHESIL BEACH AND THE FLEET	AXMOUTH TO LYME REGIS UNDERCLIFFS	EAST DEVON PURBECK WEST DORSET	
Hadrian's Wall	ALLOLEE TO WALLTOWN BOWNESS COMMON BRUNTON BANK QUARRY GLASSON MOSS IRTHING GORGE KIELDER MIRES MUCKLE MOSS RIVER EDEN & TRIBUTARIES ROMAN WALL ESCARPMENTS ROMAN WALL LOUGHS SALTA MOSS SETTLINGSTONES MINE STONECROFT MINE THE SCROGGS TIPALT BURN UPPER SOLWAY FLATS & MARSHES WHITE MOSS, CROSBYMOOR	BORDER MIRES, KIELDER-BUTTERBURN RIVER EDEN ROMAN WALL LOUGHS SOLWAY FIRTH SOUTH SOLWAY MOSSSES	SOLWAY COAST	UPPER SOLWAY FLATS AND MARSHES	SOUTH SOLWAY MOSSSES GREENLEE LOUGH MUCKLE MOSS		NORTHU MBERLAN D
Ironbridge Gorge	TICK WOOD & BENTHALL EDGE LINCOLN HILL						
Royal Botanic Gardens, Kew Buffer Zone	SYON PARK						
Saltaire Buffer Zone	TRNCH MEADOWS						

Stonehenge, Avebury and associated sites	RIVER AVON SYSTEM SILBURY HILL FYFIELD DOWN	RIVER AVON	NORTH WESSEX DOWNS		FYFIELD DOWN		
Studley Royal Park and the ruins of Fountains Abbey			NIDDERDALE				