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21 February, 2014

Dear Kishore

State Party Report 2014: State of Conservation of Giant's Causeway and Causeway Coast (United Kingdom) (N369)

I refer to the World Heritage Committee's Decision **37 COM 7B.28** following examination of the state of conservation of the Giant's Causeway and Causeway Coast World Heritage property at its 37th session (Phnom Penh, Cambodia, 2013).

In accordance with paragraph 7 of Decision **37 COM 7B.28** I am pleased to submit to the World Heritage Centre a progress report of the issues raised by the Committee concerning the state of conservation of the property. The report is presented in the indicative format, for examination by the World Heritage Committee at its 38th session in Doha, Qatar in June 2014 and is attached at **Annex A** to this letter.

The UK wishes to reassure the World Heritage Committee that the State Party and other key stakeholders with an interest in the Giant's Causeway and Causeway Coast (most notably the property's principal owner and manager, the National Trust), will continue to work closely to ensure the continued protection of the Outstanding Universal Value of this unique and important World Heritage property and its setting

Yours sincerely

Leila Al-Kazwini
Head of World Heritage



cc HE Matthew Sudders, UK Ambassador to UNESCO
UK National Commission for UNESCO
Christopher Young, English Heritage
Sandi Howie DOENI

Enclosures

State of Conservation report Giants Causeway- Annex A

Annex A

STATE PARTY REPORT 2014: STATE OF CONSERVATION OF GIANT'S CAUSEWAY AND CAUSEWAY COAST (UNITED KINGDOM) (N369)

In accordance with **36 COM 7B.28**: Paragraph 7, the State Party wishes to report on the State of Conservation.

Background

A draft of the mission report was provided to the State Party in April 2013. On receipt, the Department responsible for the Giant's Causeway and Causeway Coast property wrote to IUCN setting out a number of fundamental issues which, in the Department's view, invalidated the standing of the document as a draft report of the advisory mission. In May 2013, the State Party wrote to IUCN and again raised the issue of the factual inaccuracies in the report. We continue to await response to those letters.

Disregarding the express concerns of the State Party, the report was then submitted by IUCN to the World Heritage Committee where it was used as the basis for Decision 36 COM 7B.28 and the Recommendations that relate to this Decision.

The State Party believes that the Decision was based on a report that was misleading and factually incorrect in certain respects, and that the State Party's attempts to have the inaccuracies addressed have been overlooked.

Nevertheless, the State Party notes the report's fundamental conclusion; that 'the values for which the Site has been inscribed ... have been maintained'. This is a welcome endorsement of the care that it receives by those charged with the management of the property.

The State Party's concerns about the report are focussed on a number of specific issues that have already been highlighted to IUCN and UNESCO. Apart from these, most of the Recommendations can and will be readily incorporated into the regularly updated Action Plan for the property. The report below responds to those specific Recommendations, with the text of the World Heritage Committee Decision and mission Recommendations shown in italics, and the State Party response in plain text.

Decision: 37 COM 7B.28

The World Heritage Committee,

Having examined Document WHC-13/37.COM/7B.Add,

Recalling Decision **36 COM 7C**, adopted at its 36th session (Saint-Petersburg, 2012),

Regrets that the State Party did not keep the Committee fully informed about the Runkerry golf resort development prior to any decisions being taken that are difficult to reverse, in line with paragraph 172 of the Operational Guidelines;

Response:

The State Party notes that the provisions of paragraph 172 of the Operational Guidelines apply to property that has been inscribed. The proposed development is not within the inscribed property.

Reiterates its request to the State Party to halt the proposed golf resort development project until its potential impact on the Outstanding Universal Value (OUV) of the property has been thoroughly assessed;

Response:

The decision taken to grant development consent was taken only after full scrutiny of all relevant planning policies and legislation. Following further review by the High Court in Belfast the decision was held to be lawful and proper within the context of Northern Ireland's planning legislation. The development proposal had been subjected to rigorous examination including Environmental Impact Assessment as part of the normal application process for a development of this scale and type (prior to consent to development being given).

The key features of Outstanding Universal Value for the Giant's Causeway and Causeway Coast are the exposed rock formations and the cliffs. The Periodic Review of the state of conservation of the site, undertaken in 2012/13, considered the potential for impact (negative or positive) on the OUV and concluded that there is no credible threat to the OUV arising from development of a golf resort offsite and in the location proposed.

The State Party is aware that several individuals have misrepresented the situation to UNESCO, implying that the locus of the proposed development is within the World Heritage property.

Invites the State Party to consult the World Heritage Centre and IUCN on potential modifications and alternatives to the golf resort development project to avoid adverse impacts on the OUV of the property;

Response:

It follows from the response to Paragraphs 3 and 4 that the State Party believes that there is no justification for implementing this undertaking.

Strongly encourages the State Party to consider strengthening its legal provisions and planning framework to allow the national authorities to ensure their responsibilities for the implementation of the World Heritage Convention at the national level regarding planned

developments that could potentially impact on its World Heritage properties, and by ensuring that potential impacts on the OUV of any World Heritage property located on its territory be adequately assessed as part of the required Environmental Impact Assessment (EIA) for such developments, or through a specific Heritage Impact Assessment (HIA), and to also ensure that developments that adversely impact OUV are not permitted;

Response:

In the UK, spatial planning and heritage protection are devolved matters handled by the devolved governments in Scotland, Wales and Northern Ireland and by the UK government for England. It is therefore not possible to strengthen legislation at the national level since it is for each part of the UK to decide its own policy and means of implementing the World Heritage Convention. All governments in the UK are aware of the obligations of our membership of the World Heritage Convention and are fully committed to the protection, promotion and enhancement where possible of UK World Heritage properties and their Outstanding Universal Value.

There is a rigorous system of Environmental Impact Assessment as a consequence of the EU Directive on this subject, implemented through local regulations in each part of the UK. Developers and others are encouraged to use Heritage Impact Assessment methodology whilst preparing EIAs.

*Requests the State Party to submit to the World Heritage Centre, by **1 February 2014**, a report on the state of conservation of the property and the implementation of the above requests, as well as a copy of the EIA of the proposed Runkerry golf resort development, including a thorough assessment of its impacts on the OUV of the property.*

Response:

The following section provides response to each individual Recommendation made in the report submitted to the World Heritage Committee in 2013. Recommendations have been subdivided for clarity.

1. Recommendation 1.

The impacts of the proposed development on the Outstanding Universal Value of the World Heritage property of Giant's Causeway and Causeway Coast appear sufficiently significant that the development of the golf course should not be permitted in its proposed location.

Response to Recommendation 1. Noted.

The State Party disagrees with this unsubstantiated opinion. We have requested clarification on the grounds for this recommendation and background information on which individuals or organisations contributed to drafting the relevant sections of the report. To date we have received no reply and we continue to await a response.

2. Recommendation 2.

The State Party should review its procedures for notifying the World Heritage Committee about planned developments that could potentially impact on World Heritage properties, and ensure that potential impacts on Outstanding Universal Value are adequately assessed, including as an explicit part of the required Environmental Impact Assessment for such developments.

Response to Recommendation 2.

The State Party fully recognises the need to notify the World Heritage Centre of developments which could have an adverse impact on the Outstanding Universal Value of UK World Heritage properties. The State Party is also concerned to minimise unnecessary work for itself, agencies and other stakeholders in the UK as well as in the Centre and the Advisory Bodies, and notes that it is not always possible to get a timely response when potential developments are notified. The State Party has been in discussions with the World Heritage Centre and the Advisory Bodies regarding notification procedures and ways in which notification and response can be done in a more timely and effective manner. Most developments affecting the Outstanding Universal Value of World Heritage Properties are already subject to Environmental Impact Assessment.

3. Recommendation 3.

The State Party is advised to strengthen the position and recognition of World Heritage sites in national law, including in all regions of the State, so that developments that create negative impacts on Outstanding Universal Value are not permitted.

Response to Recommendation 3.

The UK protects its World Heritage Properties and their Outstanding Universal Value through statutory designation and through policies in the spatial planning system. Each Property has a Steering Group and a Management Plan which is regularly reviewed. Management Plans articulate policies on protection, conservation, interpretation, community outreach and identify key issues and appropriate mitigation measures. The State Party considers its system of guidance is adequate to protect World Heritage properties. Although decisions on individual applications are required to take into account a range of factors including heritage and the end result may be less than optimal, the guidance says that significant harm to Outstanding Universal Value should be wholly exceptional.

Revision of planning legislation and guidance is a matter for the individual parts of the UK and is kept under active review by each administration.

4. Recommendation 4.

The draft Management Plan for the site should include:

4.1 more detailed and site specific guidelines for management of the proposed buffer zone to the property

4.2 activities proposed in the draft plan of actions should be upgraded with a set of measurable indicators

4.3 chapters on financial and site management

Response to Recommendation 4.

The Management Plan (in draft format at the time of the Mission visit) was, as scheduled, published in May 2013; the next scheduled revision is due in 2018.

4.1 There currently is not, and never has been, a 'proposed buffer zone' for the property, so reference to this is misleading. Safeguard of the surroundings of the site is provided through the provisions of the Northern Area Plan. The Area Plan provides guidance on development matters in the area. The Mission was briefed on this issue. The site is rural in location, surrounded by sea and by farm land in private ownership (with pockets of private dwellings and a few public buildings).

New guidelines would have no standing in the existing legislation for Northern Ireland and would be unenforceable on private land. Further, such guidelines would have no beneficial impact on the integrity of the features of the WHS that are held to be essential for maintaining the OUV of the site, as these features are contained within the site itself and are not affected by land management practices on surrounding land.

4.2 This Recommendation is already being implemented and will continue to feature in the Action Plan for the site.

4.3 Financial and site management (operational issues) chapters are not included in the present World Heritage Site management plan as they are covered in the separate Property Management Plan developed by the site's owners and managers, the National Trust. However, this separation will be reviewed when drafting the revised plan in 2018.

5. Recommendation 5.

5.1 The reporting system on the implementation of the yearly management plans should be further clarified

5.2 the respective responsibilities of the WHS Officer and the WHS Steering Group for the preparation, co-ordination and implementation of the Management Plan should be clearly specified.

Response to Recommendation 5.

5.1 The current process for reporting progress was explained to the mission. In addition to regular review by the Steering Group, a chapter on progress in implementing the 2013-2019 Action Plan targets will be included in the follow-on WHS Management Plan to be drafted in 2018. It would be helpful if the authors of the report could explain in what way the current system is unclear.

5.2 The WHS Officer (now given the revised title 'WHS Project Manager') is the executive officer appointed to oversee the development of the WHS Management Plan and to co-ordinate its implementation. Within the Management Plan, relevant lead stakeholders are identified and held responsible for implementing specific actions.

The Steering Group is responsible for commissioning the Management Plan (and subordinate annual Action Plans), for ensuring the Management Plan is 'adopted' by the relevant stakeholders and for monitoring progress in implementing the Action Plans.

6. Recommendation 6.

Activities to distribute the number of visitors through the year more evenly and thus prevent further increase of visitors during the period of the highest peaks should be undertaken.

Response to Recommendation 6.

There is no evidence that the current distribution, or total number of visitors, is detrimental to the conservation status of the WHS and therefore restricting access is considered unjustified at present. The National Trust has already implemented (during 2013/14) promotions to encourage visits early and late in the day, and outside the peak summer season. The site is being marketed as a year-round attraction, with success, in markets such as the US and China. The Action Plan will continue to feature action to further encourage visits out of peak times.

7. Recommendation 7.

Diesel buses for transportation of visitors from the visitor centre to the cliffs and back should be replaced with electric vehicles.

Response to Recommendation 7.

Previous feasibility studies indicated the unsuitability of electric vehicles due to the steep slope between the Causeway and the visitor centre. However as technological advances are made in electrically powered vehicles, this will be kept under review.

8. Recommendation 8.

Additional Park and Ride facilities should be considered in order to reduce the environmental impact of additional numbers of visitors which are expected to visit the site in the future.

Response to Recommendation 8.

This Recommendation is already being implemented and will continue to feature in the Action Plan for the site.

9. Recommendation 9.

9.1 World Heritage logos should be included on signs along the paths and

9.2 additional explanation of the importance and particularities of World Heritage properties compared to other forms of national and international Protected Area designations should be given at the visitor centre.

Response to Recommendation 9.

Both activities will be added to the Action Plan for implementation. As signs along paths are replaced, the logo will be added. Further comparative information on World Heritage status will be made available at the visitor centre.

10. Recommendation 10.

Carefully revise all zoning arrangements (in order to preserve the landscape values of the property and the AONB surrounding the property) including the definition of a clear and appropriate buffer zone (which should be linked to the proposed zoning plan of the AONB – this is proposed in the dNAP, and thus would be addressed when it is adopted).

Response to Recommendation 10.

The Department is awaiting the report of the public examination into the draft Northern Area Plan 2016. Following receipt of this report, the Department will consider the recommendations of the Planning Appeals Commission before determining whether to adopt the draft plan policy and designations for the World Heritage Site with or without amendments. The report is currently expected by the end of March 2014. In the interim, the Department will continue to determine planning applications taking account of prevailing planning policy, including prematurity considerations with regard to the emerging Northern Area Plan, and all other material considerations.

11. Recommendation 11.

No developments, which could potentially threaten the OUV of the site should be allowed, and any development proposal should not be approved before the proposed buffer zone to the WHS is approved and a management plan for the site put in place (the State Party notes in comments on the draft mission report that "A management plan is in place, a setting is defined in the dNAP, planners are using the dNAP". However the mission has noted ... that both the buffer zone is not formally in place, and that development that threatens OUV has been permitted).

Response to Recommendation 11.

The Department is awaiting the report of the public examination into the draft Northern Area Plan 2016. Following receipt of this report, the Department will consider the recommendations of the Planning Appeals Commission before determining whether to adopt the draft plan policy and designations for the World Heritage Site with or without amendments. The report is currently expected by the end of March 2014. In the interim, the Department will continue to determine planning applications taking account of prevailing planning policy, including prematurity considerations with regard to the emerging Northern Area Plan, and all other material considerations.

12. Recommendation 12.

Relevant bodies should provide research results to the management bodies for relevant on-site application ... the mission recognises that extensive studies have been carried out ...

Response to Recommendation 12.

The mission report explicitly acknowledges that this has been undertaken, so the assessment of level of implementation of this open and ongoing target as only 'partially fulfilled' seems unreasonable. The matter is addressed in the current Management Plan and sharing of research findings is a condition of access to the site for research purposes.

13. Recommendation 13.

Natural threats ... due to expected climate change should be carefully monitored and appropriate mitigation measures to address these threats should be undertaken (this is an ongoing action and the mission recognises that progress has been achieved and research undertaken as an input to the management plan).

Response to Recommendation 13.

As for Recommendation 12. The current Management Plan shows that we will continue to implement this Recommendation. Again, we would invite identification of a specific target to enable us to fulfil this Recommendation.

14. Recommendation 14.

The state of conservation of the WHS, its surrounding AONB and the seascape linked to it should be enhanced.

Response to Recommendation 14.

As noted in the mission report, this is indeed the overall aim of the Management Plan, it is currently being implemented, and it is considered as an 'ongoing' issue. Again, we would invite identification of a specific target to enable us to fulfil this Recommendation.

15. Recommendation 15.

Revision of the WHS boundaries should be undertaken, in order to include a larger portion of the cliff top.

Response to Recommendation 15.

To date (and as acknowledged in the mission report) rates of erosion have not justified a formal application to UNESCO to revise the boundary of the site. The situation continues to be monitored. That said, the State Party will undertake to make a formal application for revision of the boundary in 2015/16 to include a wider swathe of cliff-top.

16. Recommendation 16

Diversification of tourism facilities which would not impact the OUV should be explored

Response to Recommendation 16

This Recommendation is already being implemented and will continue to feature in the Action Plan for the site.