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Point 7 de l'Ordre du jour provisoire: Etat de conservation de biens inscrits sur la Liste du patrimoine mondial et/ou sur la Liste du patrimoine mondial en péril

MISSION REPORT / RAPPORT DE MISSION

Giant's Causeway and Causeway Coast
(United Kingdom of Great Britain and Northern Ireland) (N 369)
Chaussée des Géants et sa côte
(Royaume-Uni de Grande Bretagne et d'Irlande du Nord) (N 369)

20 - 22 February 2013

This mission report should be read in conjunction with Document:
Ce rapport de mission doit être lu conjointement avec le document suivant:

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IUCN

**REPORT ON THE ADVISORY MISSION TO GIANT'S CAUSEWAY AND CAUSEWAY COAST, UNITED
KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND
FROM 20 TO 22 FEBRUARY, 2013**



Mission expert: Andrej Sovinc

March 2013

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EXECUTIVE SUMMARY

The IUCN advisory mission to the World Heritage site of Giant's Causeway and Causeway Coast (United Kingdom) took place from 20 to 22 February 2013. The mission was invited by the State Party, following the proposal of the UNESCO World Heritage Centre, and the consideration of the property at the 36th Session of the World Heritage Committee, in order to assess the overall state of conservation of the property and to provide technical advice on its conservation and heritage-led development. As per the ToR for the mission, the draft report was also considered for fact checking by the State Party and has been finalised taking account of those comments.

The mission recalls that the World Heritage Committee, at its 36th session (Saint Petersburg, 2012), had requested the State Party to halt the proposed development of a golf resort at the property until its potential impact on Outstanding Universal Value had been assessed. To date, an assessment of impacts on Outstanding Universal Value has not been provided by the State Party for consideration by the UNESCO World Heritage Committee..

The mission notes that the values for which the Site has been inscribed according to criterion viii, and which relate to geological phenomena, have been maintained. The cliff exposure and causeway stones, which are key attributes, remain in good condition and the ongoing natural processes of coastal erosion that maintain the property are continuing. Infrastructure for visitors remains consistent with the time of inscription on the World Heritage List, and has been improved and made more appropriate since that time.

The Outstanding Universal Value in terms of the Site's natural beauty (criterion vii) is exposed to threats through planned major development, related land use and changes in the landscape character of the World Heritage Site's proposed buffer zone. The mission is of the view that the proposed golf resort development constitutes a threat to the integrity of the property and, therefore, its Outstanding Universal Value through irreversible new landscape and visual impacts, as well as damage to the biodiversity which gives the landscape its character.

The mission advises that the impacts of the proposed developments on the Outstanding Universal Value of the World Heritage Site 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.

The mission also considers that the process of consideration of the golf development has not allowed adequate consideration in relation to Outstanding Universal Value. The present advisory mission was not invited until after the decision was taken, and a legal challenge to the approval was decided immediately after the mission visit, and could not consider any findings of the mission. A brief mention of the proposed development was made by the State Party at its initial stages in a report to UNESCO, and the State Party indicated that it would "keep the World Heritage Centre informed of progress". However no further information was provided until at the moment that the decision to approve the development was taken. Thus the mission advises that the UK revise its mechanisms for informing UNESCO of proposals which may have an effect on Outstanding Universal Value of World Heritage Sites, to allow for timely input from the UNESCO World Heritage Committee. The State Party commented on the draft IUCN mission report to indicate that it aims to operate in accordance with paragraph 172 of the Operational Guidelines to the World Heritage

Convention, and IUCN considers that in this case the process anticipated in paragraph 172 has not been followed in a fully appropriate manner.

The mission further advises that a number of key planning and management documents should be completed, and without these the protection of the property is not assured. Major planning and management documents which would ensure legal protection of the World Heritage Site still have not been adopted. A key spatial planning document, which should ensure the establishment of an appropriate buffer zone to the Site, the Northern Area Plan (dNAP), is still in the draft version while a report by the Planning Appeals Commission is awaited. The dNAP proposes establishment of a distinctive landscape zone adjacent to the World Heritage Site, which is of sufficient size, but it is not adequate in setting strict protection measures to protect the landscape and ecological values of the Site and its proposed buffer zone.

A Management Plan for the World Heritage Site for the period 2013 – 2019 also remains in draft version. In its comments on the draft mission report, the State Party states that one reason for this is in order to incorporate the recommendations of this mission. The mission considers that this Plan should develop more detailed and site specific guidelines for management of the proposed buffer zone to the Site and should contain a set of measurable indicators in this regard. Revision of boundaries of the Site to include a larger portion of the cliff top within the property is also recommended.

A reporting system on the implementation of the yearly management plans and responsible organisation/World Heritage Site officer for the implementation of the Management Plan has been put in place. The mission considers the clarity of responsibilities for managing the property could be improved. The responsibilities of the WHS Officer in the process of implementation of the Management Plan were not clear to the mission, given that the draft Management Plan states that both the WHS Officer and the WHS Steering Group have responsibility of coordinating the preparation of the Management Plan, whereas it is the WHS Steering Group that is noted in the draft MP to have responsibility for its implementation.

Natural threats to the World Heritage property (sea water rise, frequency of storm events) due to expected climate change should be carefully monitored and appropriate mitigation measures to address these threats should be undertaken.

Visitor management of the property is well-designed and the new visitor centre is well located in relation to the landscape character of the property, replacing a structure that was present at the property at the time of inscription on the World Heritage List. However, activities to distribute the number of visitors more evenly throughout the year and thus prevent further increase of visitors during the peak periods should be undertaken, diesel buses for transportation of visitors from the visitor centre to the cliffs and back should be replaced with electric vehicles, and additional Park and Ride facilities should be considered in order to reduce the environmental impact of visitors.

The mission gives the following recommendations:

- R1. 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;

- R2. 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;
- R3. 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;
- R4. The draft Management Plan for the site should include more detailed and site specific guidelines for management of the proposed buffer zone to the property and activities proposed in the draft plan of actions should be upgraded with a set of measurable indicators, as well as with chapters on financial and staff management;
- R5. The reporting system on the implementation of the yearly management plans should be further clarified and the respective responsibilities of the WHS Officer and the WHS Steering Group for the preparation, coordination and implementation of the Management Plan should be clearly specified;
- R6. Activities to distribute the number of visitors throughout the year more evenly and thus prevent further increase of visitors during the periods of the highest peaks should be undertaken;
- R7. Diesel buses for transportation of visitors from the visitor centre to the cliffs and back should be replaced with electric vehicles;
- R8. 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;
- R9. World Heritage logos should be included on signs along the paths and 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.

In addition to the above recommendations, the mission reiterates the recommendations of the 2003 joint UNESCO/IUCN mission to the World Heritage property of Giant's Causeway and Causeway Coast, including those which remain unfulfilled or only partially fulfilled:

- R10. 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);
- R11. 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 above

that both the buffer zone is not formally in place, and that a development that threatens OUV has been permitted);

- R12. Relevant bodies should provide research results to the management bodies for relevant on-site application with regard to presentation, site information and visitor safety (this is an ongoing action and the mission recognises that extensive studies have been carried out, and there was a presentation given on the innovative techniques used as part of the mission, as noted by the State Party);
- R13. Natural threats (sea water rise, frequency of storm events) 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).
- R14. The state of conservation of the WHS, its surrounding AONB and the seascape linked to it, should be enhanced. (The State Party notes that this is the aim of the management plan, and other relevant plans);
- R15. Revision of the WHS boundaries should be undertaken, in order to include a larger portion of the cliff top. (The State Party notes that this issue is being monitored);
- R16. Diversification of tourism facilities which would not impact the OUV should be explored.

1. BACKGROUND TO THE MISSION

1.1. Inscription history

The property of Giant's Causeway and Causeway Coast (N 369) was included on the World Heritage List as the first listed property of the United Kingdom, during the 10th session of the World Heritage Committee in 1986. The property is located in County Antrim, Northern Ireland (55 15' 0" N, 6 29' 7" W). It is a small property, extending approximately 3 km in length and c.0,5 km in depth . It occupies approximately 70 ha of land and a further 160 ha of sea. It encompasses the cliffs and causeways which form the key attributes of the Outstanding Universal Value of the property, visitor facilities, including the new visitor centre, retail outlets, a car park and access road and the Girona historic wreck site.

The site was inscribed under criteria (vii) (formerly natural criterion iii) and (viii) (formerly natural criterion i) of the World Heritage Convention.

1.2. Justification for the mission

At the 36th Session of the World Heritage Committee (St. Petersburg, 2012) a report and related recommendations concerning planned developments at the Giant's Causeway and Causeway Coast was made, noting the following position¹:

a) On 21 February 2012, The Minister for the Environment announced his intention to grant planning permission for a planning application for the development of a golf resort including an 18-hole championship course, clubhouse, golf academy and driving range, 120 bedroom hotel and 75 guest suites in the setting of the World Heritage property Giant's Causeway and Causeway Coast in Northern Ireland.

b) On the following day, the State Party of the United Kingdom of Great Britain and Northern Ireland submitted a state of conservation report to the World Heritage Centre. According to the report, the proposed development lies within the proposed buffer zone of the World Heritage property, a designated Distinctive Landscape Setting for which protective policies have been proposed in the draft Northern Area Plan.

c) The World Heritage Centre and the Advisory Bodies recommended to the World Heritage Committee to request the State Party to halt the development project until the potential impact of the proposed development on the Outstanding Universal Value of the World Heritage property has been assessed, and until it has been confirmed that no impact on Outstanding Universal Value will occur.

IUCN has confirmed the record of correspondence with the State Party on this property with the World Heritage Centre in relation to the below analysis.

¹ The below numbered points (a-c), and other comments on the chronology, incorporate comments from the State Party on the statement made to the 36th Session of the Committee.

The State Party first informed the World Heritage Centre of the proposed golf resort development in its report on the state of conservation of the property submitted on 1 February 2010, in which it briefly stated that *“the application will be considered within the context of development plans and planning policies including those relating to the World Heritage Site and its setting and [the State Party] will keep the World Heritage Centre informed of progress.”*

The State Party did not provide further information on the progress of the application, whilst it was being considered. Additional information provided by the State Party to UNESCO, in a report dated 22 February 2012 refers explicitly to the development having been approved. The State Party also wrote to UNESCO again with additional information on the proposed development on 22 March 2012.

The State Party report to UNESCO of 22 February 2012 includes a letter from DoE Northern Ireland to the focal point for World Heritage in the UK, which makes the following clear statement regarding the impacts of the development:

- *“It is acknowledged that the nature of the proposal is such that it will have a significant landscape and visual impact on the setting of the Giant’s Causeway and Causeway Coast World Heritage property, and the Causeway Coast AONB.”*

The State Party has stated in comments on the IUCN draft report, that the 22nd March report was in fact submitted prior to final planning permission being formally granted, which the State Party notes took place on 29 March 2012. IUCN notes that this statement is inconsistent with the statement to UNESCO dated 22nd February 2012 that the development “has been approved”, however the result is essentially that information was only provided to UNESCO following approval of the development. In June 2012 the World Heritage Committee requested that the development be halted until its potential impact had been assessed (Decision **36 COM 7C**).

The Advisory Mission to the Giant’s Causeway and Causeway Coast World Heritage property was invited by the State Party, in the context of a letter from the Director of the World Heritage Centre to Matthew Sudders, Ambassador of the Permanent Delegation of the United Kingdom of Great Britain and Northern Ireland to UNESCO, on 31 May 2012, which included as an annex *“a letter from the Director of the National Trust expressing her concerns about the development pressures threatening the World Heritage property, in particular the proposed development of a hotel and golf course in the vicinity of the site.”* In his letter of 31 May 2012, the Director of the World Heritage Centre suggested that *“In light of the scale of the development, the State Party of the United Kingdom of Great Britain and Northern Ireland might wish to invite an Advisory Mission to the property in order to assess its overall state of conservation and to provide technical advice on its heritage-led development.”* The State Party responded to that letter on 20 June 2012 by means of a letter from Paul Blaker which indicated that the authorities in Northern Ireland would welcome such a mission. The mission was then subject to long correspondence between UNESCO and the UK, including early proposals from the World Heritage Centre for dates in order to provide timely advice. The UK informally suggested dates via email on 13 December 2012 and formally invited the mission via a letter dated 8 January 2013. The mission was organised at the earliest opportunity after that time. IUCN notes that the advisory mission could have taken place at least four months prior to its actual dates, had the UK invited this input more rapidly.

The Terms of Reference for the mission were agreed between the State Party, IUCN and the World Heritage Centre, taking account of the above, and are included in Annex I. The programme of the mission is included in Annex II, and the letters submitted to UNESCO by the State Party, as noted above, are included in Annex IV.

2. NATIONAL POLICIES FOR THE PRESERVATION AND MANAGEMENT OF THE WORLD HERITAGE PROPERTY

The UK government protects World Heritage properties and their settings under the spatial planning system through a hierarchy of regional and local policies and plans. The Regional Development Strategy for Northern Ireland (RDS), produced by the Department for Regional Development (DRD), provides an overarching spatial strategy for development in Northern Ireland and all planning policy statements and local development plans made by the Department of the Environment must be 'in general conformity' with the Strategy. RDS is a framework which provides strategic context for where development should happen but does not contain operational planning policy and guidance. These are issued through Planning Policy Statements (PPS) prepared by DoE.

The RDS protects '*the World Heritage Site of Giant's Causeway...respecting and protecting its setting, conserving its physical features, managing change, and controlling access and tourism impacts in a sensitive way*'. Within Planning Policy Statement 6 (PPS6) on Planning, Archaeology and the Built Heritage which establishes policy protection for the World Heritage setting, its Policy Built Heritage 5 states: '*The Department will operate a presumption in favour of the preservation of World Heritage Sites. Development which would adversely affect such sites or the integrity of their settings will not be permitted unless there are exceptional circumstances*'. PPS 6 also provides the following interim policy amplification: '*There is currently only one World Heritage Site in Northern Ireland, the Giant's Causeway, the setting of which has not yet been formally identified by the Department. As an interim measure until such time as a new development plan is prepared for this area and this matter is addressed, development proposals within a 4 kilometre radius of the site will be subject to particular scrutiny by the Department*'. The Department has defined the setting as required under PPS 6 having regard to the World Heritage Site Management plan: the wider zone of influence, covering a 4 km radius of the site has been incorporated into the 'supportive landscape setting' in the draft Northern Area Plan (dNAP). The draft Northern Area Plan contains policies COU10 – COU13 which relate specifically to the WHS and its Settings. COU 12 of the same draft Plan states that '*no development within the 'distinctive setting' of the World Heritage Site outside of existing settlement limits will be approved* ' apart from '*exceptionally modest scale facilities...necessary to meet the direct needs of visitors to the WHS, appropriately scaled and designed extensions to dwellings and replacements of existing occupied dwellings...*'.

The dNAP is intended to give full effect to the 2003 UNESCO-IUCN mission recommendation to establish "an appropriate and clearly defined buffer zone" for the WHS. The dNAP included full public inquiry and the Planning Appeals Commission has yet to report on the Inquiry. DoE will then formally adopt the Plan. It has to be noted that the Northern Area Plan is still in its draft form and hence it is still not an officially approved document. However given this plan is intended to incorporate policies that will provide increased protection for the World Heritage property, it

appears to be highly questionable to approve a development that appears to be contrary to the provisions of this plan before it is finalised. In considering the draft mission report, the State Party stated that “full consideration was given consideration to the provisions of the dNAP in consideration of the proposed development.” The mission however does not follow how the development as proposed can be seen as conformable to the provisions of COU12 as noted above.

2.1. Protected Area Legislation – National

Key conservation designations within and around the World Heritage property include:

-Giant's Causeway National Nature Reserve (NNR; designated under the Amenity Lands Act (Northern Ireland) 1965), covering the coastline of the WHS, primarily in recognition of its diverse and important plant communities,

-Giant's Causeway and Dunseverick Area of Special Scientific Interest (ASSI; designed under the Nature Conservation and Amenity Lands (Northern Ireland) Order 1985), covering the beach system of international importance demonstrating beach states from dissipative to reflective,

-Causeway Coast Area of Outstanding Natural Beauty (AONB; designated under the Nature Conservation and Amenity lands (Northern Ireland) Order 1985), giving formal statutory recognition to the quality of the landscape, its scenic quality, open distinctive character, and the diversity and resource value of its coastal landscapes from Portrush to Ballycastle, a distance of 29 kilometres. The WHS takes centre stage within the AONB.

Maps of the above conservation designations are provided in ANNEX VI.

2.2. Protected Area designations - international

-North Antrim Coast Special Area of Conservation (SAC), which includes the whole of the World Heritage property, was created under the European Union Habitats Directive and forms part of the Natura 2000 network.

-The Skerries and Causeway is a candidate Special Area of Conservation site which was submitted to the European Commission in 2012.

Maps of the above international conservation designations are provided in ANNEX VI.

2.3. Institutional Framework

The Department for Culture Media and Sport in London is the government body responsible for world heritage policy in the United Kingdom. Management of World Heritage sites and identification of potential new sites is devolved.

DoE designates areas of AONB in Northern Ireland where the landscape meets the criteria of exceptional landscape quality.

The Northern Ireland Environmental Agency (NIEA) and DoE Planning are both part of DoE. NIEA is responsible for environmental and heritage protection, including the World Heritage site. DoE Planning is responsible for planning policy and determining planning applications.

The structure of governance arrangements in Northern Ireland means that the Minister of the Environment is responsible for both environmental and heritage protection and for making major planning decisions.

Within Northern Ireland, as in the rest of the United Kingdom, World Heritage properties are not statutory designations in national law. Thus no single World Heritage site management body for the Giant's Causeway and Causeway Coast was identified, but a World Heritage Site Steering Group (WHSSG) is convened regularly to allow stakeholders involved with the environmental stewardship of the property to discuss matters of common concern and to agree action where needed. WHSSG is currently chaired by the representative of DoE and the Group includes representatives from different stakeholders and government departments.

The World Heritage Site officer (and their assistant) work within the Causeway Coast and Glens Heritage Trust (CCGHT). CCGHT is the body responsible for this area's AONB (which means that the officer is responsible for both entities, the World Heritage property and the wider AONB). Although the positioning of the World Heritage Site officer within CCGHT allows them to forge strong links with the AONB managers they remain removed from day-to-day operational management of the World Heritage property itself as this is within the remit of the National Trust.

The World Heritage Site officer is in charge of the preparation of the Periodic Report due to be submitted by the UK Government in 2013 and of ensuring the finalisation of the new Management Plan. They report to the (Giant's Causeway and Causeway Coast) World Heritage Site Steering Group.

2.4. Management structure

There are five bodies with legal responsibilities regarding the Giant's Causeway and Causeway Coast World Heritage property: the Crown Estate (legal owner of all land between the high and low water mark including the intertidal area of Causeway Stones), Moyle District Council, two private landowners and the National Trust (NT). NT currently owns approximately 95% of the terrestrial site, including almost all of the cliffs and foreshore, the Causeway Hotel and the Visitor Centre. NT is responsible for public access and visitor management at the property and along the coastal path and has undertaken conservation management since it acquired the land in 1961. A (diesel) bus service, before intended to provide access to the stones of Giant's Causeway only to disabled visitors is now available to all visitors.

Since 2005 NT has followed the World Heritage Site Management Plan and will presumably be managing the site in the future according to the draft new Management Plan 2012-18 which is already presented in its draft format. However, due to the fact that there is no statutory site management body appointed and World Heritage is not a statutory designation, likewise the management plans of World Heritage properties have no statutory designations. The management plan for the property is implemented within the context of a hierarchy of local, regional, national and international policies.

2.5. Response to the recognition of values under international treaties and programmes

Within the UK, recognition and protection of World Heritage properties and their settings is provided under the spatial planning system through a hierarchy of regional and local policies and

plans. A number of national and international designations recognise the Area's scientific, landscape and conservation significance which should provide legal protection to the property, which proved to be effective for the relatively narrow core World Heritage property but not so for the adjacent zone. The fact is that no adequate buffer zone has been defined where the integrity of the property would be protected. The surrounding Causeway Coast AONB, where the distinctive landscape area as listed in the dNAP is located, should perform, inter alia, the function of the buffer zone to the property, including the necessary wider policy and planning protection from impacts to its values from threats located outside its boundaries. This could be concluded based on the definitions through the planning documents, notably Planning Policy Statement 6 (PPS6) and its Policy Built Heritage 5 which does not permit any development which would adversely affect the property or the integrity of its setting '*... unless there are exceptional circumstances*'.

Recognition of the integrity and the Outstanding Universal Value of the Giant's Causeway and Causeway Coast through the spatial planning system is just one of several non-hierarchical planning policies in the RDS. Other planning policies such as those pertaining to economic development and tourism have the same legal leverage as the policies pertaining to the protection of the World Heritage property. Consequently, perceived economic benefits risk taking precedence over World Heritage protection. Major planning decisions are taken by the Minister.

3. IDENTIFICATION AND ASSESSMENT OF ISSUES

The main risks to OUV at the Giant's Causeway and Causeway Coast and assessment of these threats and effectiveness of mitigation measures are listed as follows:

3.1. *Damage to the landscape setting through inappropriate development or land use*

Major new development, a project called the Runkerry Development, has been granted planning permission by the Minister for Department of the Environment of Northern Ireland (DoE); it consists of a golf resort including an 18-hole championship golf course, clubhouse, golf academy incorporating driving range, a 3-hole practice facility, 120-bedroom hotel conference centre and spa, 75 guest suites/lodges, car parking and maintenance buildings and landscaping.

The site for the Runkerry Development sits around 550 metres south of the World Heritage property and within the "distinctive landscape setting" as stated in the dNAP which should be regarded as a future buffer zone for the Giant's Causeway and Causeway Coast. The core of the development site, "*of approximately 148 hectares, is located about 2 km to the south of the Giant's Causeway visitor centre and to the north and east of the settlements of Bushmills and Portballintrae (DoE)*". The entire WHS covers approximately 70 ha.

The mission is of the view that the proposed golf resort development constitutes a threat to the integrity of the site and its Outstanding Universal Value through an irreversible new landscape and visual impacts that affect the setting of the property, as well as the damage to the biodiversity which gives the wider landscape its character.

Integrity is a measure of the wholeness and intactness of the natural heritage and its attributes. The Operational Guidelines for the Implementation of the Convention (*Operational Guidelines*) require that "*biophysical processes and landform features (of the WHS) should be relatively intact*" but notes

that *“human activities, including those of traditional societies and local communities...may be consistent with the Outstanding Universal Value of the area where they are ecologically sustainable”*. The principle of integrity of the Giant’s Causeway and Causeway Coast appears to have been neglected or misunderstood when planning for the major golf development within the 4 km radius of the property, where according to PPS 6 the development should have been subject to particular scrutiny by DoENI. This area is located within ‘Causeway Coast & Rathlin Island Landscape Character Assessment area (as defined in the analyses of the Landscapes of the Region) where key visual characteristics include high plateau landscape, exposed sheep-grazed landscape, rural landscape with villages associated with coastal bays and ruined castles on cliff tops.

The mission considers that this character of the landscape which provides the setting to the property is under threat. Up to 10 % of the “Distinctive Setting” area would be urbanised if the golf resort development proceeds. Radical changes in its traditional landscape character and visual amenity will be introduced due to the development and its disparate scales. Golf tees, greens, fairways and buildings will replace a landscape of agricultural fields of various sizes, areas of dune grasslands, sheep-grazed grasslands and an area of woodland. Such a development cannot be considered a “traditional activity” (as mentioned in the *Operational Guidelines*), nor can it be considered to correspond to the type of exceptional circumstances that provide a justification of development to damage the values of the World Heritage property. In addition, there are a range of secondary concerns regarding the impacts on the ecology of the area of the proposed development.

The submission of the State Party to UNESCO of 22 March 2012 confirms that *“the site [of the development] is clearly visible from various vantage points in the immediate vicinity including the approaches to the WHS. There are also panoramic views of the site from the Giant’s Causeway car park and from cliff walk above, though views from here to the built elements are over a distance of approximately 2 km. It has been acknowledged that the nature of the proposal is such that it will have a significant landscape and visual impact on the setting of the WHS, and of the AONB”*.

The buildings and golf course will be clearly visible in views from the WHS and be significant elements in the landscape (for example: the proposed golf academy reaches almost ten metres in height at its highest point). Their impacts on the visual and landscape values of the property, as raised with the mission, include:

- 120 bedroom hotel: although planned for the side of a hill and partly covered with grass roofs, the large amount of glazing on the building and the size of the complex of buildings will impact on visual and landscape qualities of the area,
- other major buildings (clubhouse, golf academy, 3 hole practice facility) will be linked through a network of roadways, footpaths, street lightings etc and will create a visual impact,
- the 18 hole golf course will make a significant change in the landscape, through the introduction of manicured elements of the course and associated artificial infrastructure,
- 75 lodges would blur the transition between the settlement of Bushmills and the rural landscape beyond – a key element in the experience of approaching the WHS.

The 22 March 2012 submission of the State Party to UNESCO states that DoE has sought to work with developers to “ensure that the proposal is as visually integrated as possible into its surroundings and that mitigation proposals are practical, appropriate and deliverable”. But it also notes that DoE admits that “the development of this scale will always have an impact on the landscape”, in particular on the landscape patterns and integrity of the WHS and its setting. While one can argue that “the development will draw attention to and increase awareness of the WHS” (DoE) it has to be added that introduction of a major championship golf development over a traditional rural/agricultural landscape and the resulting impacts on the OUV of the property do not lead to an appropriate type of appreciation of a World Heritage property.

The location of such a major development proposal as the Runkerry golf resort in the “Distinctive Landscape Setting” for the World Heritage property where, “the landscape closely associated with the WHS extends several kilometres from the south of the Site and is visually intrinsically linked providing both a backdrop for visitors within the Site and a foreground for visitors approaching the Site” (Countryside Policy 11), which is located within the AONB, also raises the question of effectiveness of legal protection for the property’s buffer zone. Although the extent of the proposed “Distinctive Landscape Setting” within a 4 km radius of the property’s boundaries seems to be adequate to protect the wider setting of the property, the same cannot be said for the statutory protection of the integrity of the property, located within the AONB.

The mission considers that protection of the OUV of the property and of its setting (and proposed buffer zone) through existing legal and spatial control measures cannot be considered sufficient as planning permission was granted for a major development in the property’s setting. It is also not clear how changes in the landscape character induced by setting a major golf resort, which is clearly considered to have impact on the landscape and associated biodiversity, can be considered to preserve the values for which the AONB (where the proposed buffer zone is located) was designated.

Adverse impacts on Outstanding Universal Value were not directly assessed in the Environmental Statement (ES), which does not include a direct assessment on the implications for OUV. The application for the golf resort was submitted to the DoE already in 2007 and accompanied by an ES, pursuant to the then applicable Planning Regulations in Northern Ireland (the Environmental Impact Assessment Regulations). It was not until 2010 that the State Party first informed the World Heritage Centre of this development, however the 2007 ES was not submitted. At the time, the State Party had noted that the proposed development would be “considered within the context of development plans and planning policies including those relating to the World Heritage Site and its setting” and that it would “keep the World Heritage Centre informed of progress”. Further information on the proposed development was submitted to the World Heritage Centre on 22 February 2012 after the Minister announced he was minded to grant planning permission for the development, but again the 2007 ES was not submitted. The State Party did provide a weblink to the application where addenda (dated 2011) to the ES are available (but not the actual ES itself), but none of these assess the impact of the proposed development on the Outstanding Universal Value of the World Heritage property.

In relation to the present Advisory Mission, IUCN notes that almost simultaneously with its visit a court decision to approve the above development was taken, following an appeal against the

decision. As noted above, there was clearly a large window of opportunity during which the State Party could have sought advice on these matters in a timely fashion but no advantage has been taken of this. This clearly is of concern, and poses significant questions on the need for the State Party to revise and improve its communication processes with UNESCO on the World Heritage Convention to ensure timely advice can be secured.

3.2. *Attrition of natural features through natural processes such as cliff erosion or sea level change*

The dynamic nature of the Causeway coast itself, its extremely regular columnar jointing of the basalts and a superlative horizontal section is expressed by the occurrence of slope failures which range in scale from shallow-translational flows to large rotational landslides and rock falls measured in thousands of tonnes. These are natural processes which are often triggered after significant rainfall. Gradual weakening of the underlying geology and undermining of cliffs by marine erosion and human excavations to facilitate the construction and maintenance of footpaths are additional influencing factors.

Extensive work has been undertaken to understand the coastal processes that govern the natural evolution of the property. It is expected that the impacts of natural processes will increase in the future as a result of climate change induced drivers. These include potential sea level rise and increased frequency of storm events.

Dynamic erosion processes are an essential part of the values of the site so measures to prevent natural slope failures should continue to be avoided, and a priority given to mitigating risks through the management of visitor access to ensure appropriate standards of visitor safety, and awareness of natural hazards.

Several monitoring programmes are in place. The most comprehensive is focusing on integrated digital hazard mapping of the property. It identifies the areas of highest hazard risks. Visitors are informed before visiting those areas about the routes and necessary safety measures (there are four trails, recently upgraded and colour coded, all equipped with information). In addition, the National Trust rangers give additional advice and information to the visitors. Efforts are made to overlay conditionally stable scree by a thin soil cover and a vegetation mat to prevent further landslides. Rocks and stones which spill over the trails or pose a threat to visitors are effectively removed.

The above mitigation measures apply mainly to increase the security of visitors. Apart from continuous monitoring of erosion events additional measures should be considered to secure long-term protection of the geological phenomena and natural beauty of the site. The World Heritage property includes only a very narrow strip at the top of the cliffs; extension of its boundaries to include a wider area at the top of the cliffs should also be considered, to allow for the continued and slow inland migration of the property boundaries over time.

3.3. *Damage to natural features through human impact*

There is no major direct human impact on the columnar jointing of the basalts although people are allowed to explore these features. Vandalism, which used to be a problem in the past, is now of very small and very limited intensity. Although people are allowed to use marked trails only, with current

visitation numbers of 600.000 visitors per year (and estimated in the National Trust's Property Business Plan (2011) to receive 1 million visitors a year), and even if there is a small percentage of visitors hiking out of the trails, this could cause additional pressures on erosion processes, so strict control of the visitor flow is required.

A diesel shuttle bus for transportation of visitors from the visitor's centre to the Causeway Stones and back, originally available only to the disabled, is now available to all visitors. It should be replaced by an electric bus.

Measures to reduce the numbers of visitors in the peak tourism season should be considered to make yearly distribution of visitors more even. A Park and Ride system in Bushmills is already in place and additional similar systems should be introduced. This would provide benefits not only to the site but also to the wider area where local life is highly influenced by heavy traffic.

The new visitor centre (with parking lots), which opened in 2012, is very well blended into the landscape. It is an iconic and innovative centre, constructed by basalt columns and walls of glass.

Mitigation measures are secured through legal control and management measures. The National Trust safeguards and provides public access to the area through conservation management, campaigning, sharing expertise and direct ownership. NT work at the Causeway is guided by a World Heritage Site Steering Group. The future management of the property will presumably be guided through the new Management Plan.

4. CONCLUSIONS AND RECOMMENDATIONS

The Giant's Causeway and Causeway Coast World Heritage property is of Outstanding Universal Value for its geological (including geomorphological) phenomena, representing the major stages of the earth's evolutionary history, and its natural beauty. Associated values include ecosystems and habitats for threatened species.

The mission notes that the values for which the property has been inscribed according to criterion viii, and which relate to geological phenomena, have been maintained. The cliff exposures and causeway stones, which are key attributes, are not deteriorated.

However, the Outstanding Universal Value in terms of the property's natural beauty (criterion vii) is exposed to threats through planned major development, related land use and changes in the landscape character of the property's setting (and proposed buffer zone). The proposed golf development constitutes a threat to the integrity of the property and its Outstanding Universal Value through an irreversible new landscape and visual impacts that affect the setting of the property, as well as the damage to the biodiversity which gives the wider landscape its character.

The mission gives the following recommendations:

- R1. 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;
- R2. 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;

- R3. 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;
- R4. The draft Management Plan for the site should include more detailed and site specific guidelines for management of the proposed buffer zone to the property and activities proposed in the draft plan of actions should be upgraded with a set of measurable indicators, as well as with chapters on financial and staff management;
- R5. The reporting system on the implementation of the yearly management plans should be further clarified and the respective responsibilities of the WHS Officer and the WHS Steering Group for the preparation, coordination and implementation of the Management Plan should be clearly specified;
- R6. Activities to distribute the number of visitors throughout the year more evenly and thus prevent further increase of visitors during the periods of the highest peaks should be undertaken;
- R7. Diesel buses for transportation of visitors from the visitor centre to the cliffs and back should be replaced with electric vehicles;
- R8. 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;
- R9. World Heritage logos should be included on signs along the paths and 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.

In addition to the above recommendations, the mission reiterates the recommendations of the 2003 joint UNESCO/IUCN mission to the World Heritage property of Giant's Causeway and Causeway Coast, including those which remain unfulfilled or only partially fulfilled:

- R10. 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);
- R11. 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 above that both the buffer zone is not formally in place, and that a development that threatens OUV has been permitted);

- R12. Relevant bodies should provide research results to the management bodies for relevant on-site application with regard to presentation, site information and visitor safety (this is an ongoing action and the mission recognises that extensive studies have been carried out, and there was a presentation given on the innovative techniques used as part of the mission, as noted by the State Party);
- R13. Natural threats (sea water rise, frequency of storm events) 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).
- R14. The state of conservation of the WHS, its surrounding AONB and the seascape linked to it, should be enhanced. (The State Party notes that this is the aim of the management plan, and other relevant plans);
- R15. Revision of the WHS boundaries should be undertaken, in order to include a larger portion of the cliff top. (The State Party notes that this issue is being monitored);
- R16. Diversification of tourism facilities which would not impact the OUV should be explored.

ANNEX I Terms of Reference of the mission

12/02/2013

IUCN Advisory Mission to the World Heritage property “Giant’s Causeway and Causeway Coast”, United Kingdom of Great Britain and Northern Ireland

20 - 22 February 2013

Terms of Reference

An Advisory Mission to the Giant’s Causeway and Causeway Coast World Heritage property has been invited by the State Party. This is in the context of a letter from Kishore Rao to Matthew Sudders, Ambassador to UNESCO, on 31 May 2012, to suggest that the State Party might wish to invite an Advisory Mission to the World Heritage property and the response to that letter dated 20 June 2012 from Paul Blaker which indicated that the authorities in Northern Ireland would welcome a mission.

The purpose of the mission will be to assess the overall state of conservation of the property and to provide technical advice on its conservation and heritage-led development.

Taking into consideration the Operational Guidelines for the Implementation of the World Heritage Convention, the Advisory Mission shall:

- visit the Giant’s Causeway and Causeway Coast World Heritage property and meet the authorities responsible for its protection and management;
- assess the overall state of conservation of the property and the factors affecting its Outstanding Universal Value and integrity;
- provide technical advice on the management of the property and its Outstanding Universal Value;
- on the basis of the findings, prepare a draft report, outlining recommendations for consideration by the World Heritage Committee on the requirements for ensuring the protection of the property’s Outstanding Universal Value;
- seek comments from the State Party on the factual accuracy of the draft report before completion of the final report.

ANNEX II Programme of the mission

Wednesday 20 February

- 1145-1200 Dr Sovinc welcomed to Northern Ireland.
- 1200-1330 Working lunch: introductions and recap on Terms of Reference
- 1330-1500 Meeting with DOE officials and the Department's approach to protecting the World Heritage Site (WHS) and its Outstanding Universal Value.
- 1500-1630 Travel to hotel in Portrush with NIEA contact officer.
Dinner at the hotel.

Thursday 21 February

- 0900-1030 Driving tour of the setting of the World Heritage Site
- 1030-1200 Meeting with World Heritage Site Steering Group
Presentation from WHS Officer on 'the WHS Management Plan' and on 'the preparation of the Periodic Report on the State of Conservation of the Site'
- 1200-1230 Drive to Giant's Causeway and Causeway Coast WHS
- 1230-1400 Lunch hosted by the National Trust at the Visitor Centre.
- 1400 – 1700 Visit to the Site and discussion.
- 1700-1800 Travel back to hotel via the village of Bushmills (short stop at the park and ride facility for the Site)
- 1830 Informal dinner at hotel

Friday 22 February

- 0900-1100 Drive to the surrounding area of the location, stops at scenic landscape areas
- 1100-1400 Departure from hotel. Lunch en route to Belfast.
- 1400-1500 Debriefing meeting at Klondyke, Belfast.
- 1500 Transfer to airport

ANNEX III Examination of the State of Conservation by the World Heritage Committee

Following the inscription of the property on the World Heritage List in 1986, its state of conservation was examined by the World Heritage Committee on several occasions, leading the Committee to take the following decisions:

26 COM 21B.24 (2002);

27 COM 7B.21 (2003), following a joint World Heritage Centre/IUCN reactive monitoring mission to the property in 2003 (see <http://whc.unesco.org/en/list/369/documents/> for the mission report);

29 COM 7B.27 (2005);

32 COM 7B.28 (2008);

36 COM 7C (2012).

Annex IV: Information sent to UNESCO by the State Party

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Francesco Bandarin
Director
UNESCO World Heritage Centre
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France

Your Ref
Our Ref

1 February 2010



department for
culture, media
and sport

Dear Francesco

State Party Report 2010: State of Conservation of Giant's Causeway and Causeway Coast (United Kingdom) (N 369)

I refer to your letter of 12 August 2008 to H.E. Mr Peter Landymore and the World Heritage Committee's Decision **32 COM 7B.28** following examination of the state of conservation of the Giant's Causeway and Causeway Coast World Heritage property at its 32nd session (Quebec City, Canada, 2008).

In accordance with paragraph 5 of Decision **32 COM 7B.28** I am pleased to submit to the World Heritage Centre a progress report of the issues raised by the Committee, specifically relating to the planning and design for the new visitor centre, and on the state of conservation of the property. The report is presented in the indicative format, for examination by the World Heritage Committee at its 34th session in July of this year 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 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.

Please let me know if you require any further information.

Yours sincerely

Peter Marsden
Head of World Heritage

Cc H.E Mr Matthew Sudders, UK Permanent Delegate to UNESCO
UK National Commission for UNESCO
ICOMOS
IUCN
Northern Ireland Environment Agency



Annex A

STATE PARTY REPORT 2010: STATE OF CONSERVATION OF GIANT'S CAUSEWAY AND CAUSEWAY COAST (UNITED KINGDOM) (N 369)

1. Response from the State Party to the World Heritage Committee's Decision, paragraph by paragraph
[Note: this information has to refer to developments over the past year or since the last decision of the Committee for this property]

Decision: 32 COM 7B.28

The World Heritage Committee,

1. *Having examined Document WHC-08/32.COM/7B,*
2. *Recalling Decision 29 COM 7B.27, adopted at its 29th session (Durban, 2005),*

Noted.

3. *Takes note of the detailed report provided by the State Party on the developments concerning the visitor centre and improved planning processes and management of the property;*

Noted

4. *Welcomes the involvement with stakeholders in implementing the decisions adopted by the World Heritage Committee at its 27th (UNESCO, 2003) and 29th (Durban 2005) sessions and the recommendations of the 2003 joint World Heritage Centre / IUCN Reactive Monitoring mission to build a new visitor centre and notes that planning permission was not granted for a private investor development proposal;*

Noted.

5. *Requests the State Party to submit to the World Heritage Centre, by 1 February 2010, an update report on the situation of the planning and design for the visitor centre, for review.*

Noted.

In accordance with paragraph 5 of the Decision, the State Party wishes to report progress to Committee on the planning and design of the visitor centre.

Background

In my letter to the World Heritage Centre of 2 March 2009, I reported that Northern Ireland's Minister for the Environment had authorised a Notice of Opinion to approve a planning application from the National Trust for a new visitor centre at the World Heritage Property. Details of the National Trust's proposals had previously been notified to the World Heritage Centre in Mandy Barrie's letter of 30 January 2008.

The National Trust assumed responsibility from the Department of Environment, Trade

and Investment, Northern Ireland (DETI) in February 2008 and with the support of the local authority, Moyle District Council, is leading on the project to build new visitor facilities at the Giant's Causeway and Causeway Coast World Heritage property. The proposals, based on a design by Dublin based architects, Heneghan Peng, winners of an International Design Competition for a visitor centre in 2005, aim to improve visitor experience and provide new opportunities for people to learn about the heritage of the area.

The new facility will contain visitor orientation information, interpretation, retail, catering and other visitor services. The building is designed to integrate into the landscape and is limited in size to 1815m² within the footprint of the previous visitor centre which burned down. The plans include an increase in the level of car parking available at the site and in the wider area. Further details can be seen at <http://agiantcause.nationaltrust.org.uk/>

Planning Application

The Trust entered into a contractual arrangement with the Heneghan Peng led design team and submitted a planning application to Department of Environment for Northern Ireland in June 2008 which was approved in January 2009 subject to a number of planning conditions to be met by the National Trust including the provision of a transport management plan and off-site parking arrangements. A number of minor supplementary planning applications relating to these conditions have been submitted.

Funding

The project is expected to cost £18.5m. The National Trust has already pledged £4m towards this. Applications for funding to the Heritage Lottery Fund and Northern Ireland Tourist Board (NITB) have been submitted. The Heritage Lottery Fund confirmed a £3m award in January 2010 and a decision on the NITB bid is expected in the coming weeks. The National Trust has launched an appeal to bridge a £2.25m gap that it has agreed to underwrite to allow work to commence as soon as possible.

Current Position

Appointment of contractors for enabling works and the main visitor centre build will be completed shortly following a publicly advertised procurement process in line with EU legislation. It is expected that enabling site works will begin in May 2010 with the main build commencing in September 2010. The project is expected to be completed by June 2012, subject to relevant planning consents being received, the full funding package being in place and final agreement being reached with Moyle District Council regarding the transfer of its holdings at the site to the National Trust.

State Party View

The State Party believes that the current proposals for this development will not have an adverse impact on the Outstanding Universal Value of the world heritage property and that, as all new parking will be contained on brown field sites, this will not impact on the integrity of the property or its setting. The World Heritage Site Management Group will continue to advise on the design, interpretive content and integration of the visitor centre within the World Heritage property and keep the State party informed of progress.

2. **Other current conservation issues identified by the State Party**
[Note: conservation issues which are not mentioned in the Decision of the World Heritage Committee or any information request from the World Heritage Centre]

There are currently no other conservation issues.

3. **In conformity with paragraph 172 of the *Operational Guidelines*, please describe any potential major restorations, alterations and/or new construction(s) within the protected area (core zone and buffer zone and/or corridors) that might be envisaged.**

Policies for the protection of UK World Heritage properties are in place but we still look for opportunities to reinforce, enhance and clarify this level of protection. The Department of the Environment in Northern Ireland is currently the Planning Authority (though this function is proposed to devolve to new Local Authorities in 2011). The Giant's Causeway and Causeway Coast is currently the only World Heritage Site in the region and the Regional Development Strategy¹ identifies the need to protect the site and its setting. Chapter 4.0 of Planning Policy Statement 6, Planning, Archaeology and the Built Environment², provides policy on World Heritage Sites. Policy BH 5 states that; 'The Department will operate a presumption in favour of the preservation of World Heritage Sites. Development which would adversely affect such sites or the integrity of their settings will not be permitted unless there are exceptional circumstances'.

The draft Northern Area Plan,³ in which the current World Heritage Site lies, was published in May 2005 but has been subject to two judicial challenges. It includes policies that provide for strict protection of the World Heritage Site and its Distinctive Landscape Setting confining development to essential facilities within the World Heritage Site and modest facilities necessary to meet visitor needs within the Distinctive Landscape Setting. It also curtails the extension or replacement of dwellings within the Distinctive Landscape Setting. Although the plan has not been finalised its proposals remain material considerations.

In relation to development proposals at the Giant's Causeway and Causeway Coast World Heritage property, a planning application was submitted to the Department of Environment Northern Ireland in December for a tourism development in the buffer zone of the property and is currently under consideration by the Department. The proposed development includes a golf resort including 18-hole championship golf course, clubhouse, golf academy and a 120 bedroom hotel. We are currently seeking the views of our professional advisors on the proposals and any potential impact on the Outstanding Universal Value of the property. The application will be considered within the context of development plans and planning policies including those relating to the World Heritage Site and its setting and we will keep the World Heritage Centre informed of progress.

¹http://www.planningni.gov.uk/index/policy/dev_plans/devplans_az/northern_2016/northern_countryside/northern_countryside_causeway.htm

²http://www.planningni.gov.uk/index/policy/policy_publications/planning_statements/pps06-archaeology-built-heritage.pdf

³http://www.planningni.gov.uk/index/news/news_devplans/news_devplans_northern2016.htm

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Kishore Rao
Director, World Heritage Centre
UNESCO
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22 February 2012

Your ref: CLT/WHC/4492/GB/PA/PT

Dear Kishore

**STATE OF CONSERVATION OF THE WORLD HERITAGE PROPERTY
"THE GIANT'S CAUSEWAY AND CAUSEWAY COAST" (UNITED
KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND)**

Thank you for copying to me your letter of 31 January 2012 to H.E. Mr Matthew Sudders about the World Heritage Property "Giant's Causeway and Causeway Coast" and the proposed development of a hotel and golf course in the vicinity of the site.

Mr. Alex Attwood MLA, Minister in the Department of the Environment in Northern Ireland, has now considered this planning application and decided to approve it. A link to the application can be found here:

http://epicpublic.planningni.gov.uk/PublicAccess/zd/zdApplication/application_detailview.aspx?caseno=LB7XSYSVDT856

I am attaching a letter from Leo O'Reilly, the Permanent Secretary of the Department of the Environment in Northern Ireland. His Department is preparing a report which will outline this project and how the decision to approve it was taken in the context of provisions to protect the World Heritage property. They expect it will set out both the positive and negative effects on the site, and explain how the planned mitigating actions will protect or improve the Outstanding Universal Value of the site overall. Obviously I have not yet seen the report, but I will, of course forward it to the World Heritage Centre when we receive it.

Department for Culture, Media and Sport

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Yours sincerely



Paul Blaker
Head of World Heritage

cc: H.E Mr. Matthew Sudders, the Permanent Delegate of the United Kingdom to UNESCO
UK National Commission for UNESCO
Susanna Allen, Department of the Environment, Northern Ireland



**STATE OF CONSERVATION OF THE GIANT'S CAUSEWAY AND
CAUSEWAY COAST WORLD HERITAGE PROPERTY
ADDITIONAL INFORMATION**

1.0 The Planning Application

- 1.1 The application that has been approved is for full planning permission for a golf resort including a 18-hole championship golf course, clubhouse, golf academy, 120 bedroom hotel and 75 guest suites. The Department does not consider that this decision will set a precedent for a similar type of development within the setting of the WHS and is committed to retaining and implementing the protective policies for the WHS and its setting.

2.0 Site and Surrounding Area

- 2.1 The Giant's Causeway and Causeway Coast World Heritage property was inscribed as a natural site in 1986 on the basis of its demonstration of two outstanding universal values summarised as geological phenomena and natural beauty. The features of geological and geomorphological interest which are globally significant are fully represented within the property. While the natural beauty is related to the cliff exposures of columnar and massive basalt within the site, this is set within more extensive coastal scenery.
- 2.2 The development site, of approximately 148 hectares, is located about 2 km to the south of the Giant's Causeway visitor centre and to the north and east of the settlements of Bushmills and Portballintrae. It consists of a number of undulating agricultural fields of various sizes, areas of dune grassland and an area of woodland known as the Esthersfield Plantation. The Bush River is adjacent to the southern and western boundaries with Whitepark Road and Causeway Road adjacent to the eastern and northern boundaries.
- 2.3 The site is located within the Causeway Coast Area of Outstanding Natural Beauty (AONB) and adjacent to Runkerry Area of Special Scientific Interest. The site also lies within the Distinctive Landscape Setting of the World Heritage Site (WHS) for which protective policies have been proposed in the draft Northern Area Plan.

- 2.4 The site is clearly visible from various vantage points in the immediate vicinity including the approaches to the WHS. There are also panoramic views of the site from the Giant's Causeway car park and from the cliff walk above though views from here are over a distance of approximately 2 km.

3.0 Mitigation

- 3.1 The Department has sought to work with all parties to ensure that the proposal is as visually integrated as possible into its surroundings and that mitigation proposals are practical, appropriate and deliverable. The amendment to the original application has reduced its prominence considerably. The Department's Design Unit has been involved in negotiations with the applicant to secure a better design and achieve maximum integration of the scheme into the landscape. The Department's Landscape Architects met with the agent on several occasions and are content with the revised landscape management plan submitted in September 2011.
- 3.2 These amendments have taken account of potential impacts on the landscape setting of the WHS. The major built form elements of the scheme have been moved closer to Bushmills and away from the WHS. Relocation of various elements in conjunction with the use of the existing topography augmented with a detailed Landscape Management Plan will help to reduce the landscape and visual impact and the potential for the scheme to have a significant detrimental impact on the setting of the WHS. While a development of this scale will always have an impact on the landscape, the changes to the position and design of the elements of the proposal in conjunction with retention and enhancement of the existing vegetation will undoubtedly reduce the visual impact of the scheme.

4.0 Impacts on the World Heritage Site and its setting

- 4.1 A number of consultees to the planning application expressed reservations in relation to the potential for the proposal to have a significant landscape and visual impact on the setting of the Giant's Causeway WHS. They noted that the planning application will introduce large scale buildings and elongate the built form of Bushmills, while the golf course will change the character of the development site from its rural, farmed landscape. This will be highly evident when viewed from parts of the WHS and approaches to it.
- 4.2 In arriving at a decision to approve this proposal, the Department has sought to retain and to make the most of the heritage resources of the site. Through the use of conditions on the planning approval, it is intended that positive benefits can be realised.
- 4.3 The developer will be required to deliver the landscape management plan for a 20 year period, the objective of which is to sustain and

enhance the landscape and secure the better visual integration of the development. The proposed conditions include measures to protect landscape features, such as the woodland, which are currently not subject to planning control or positive management. The developer also intends to restore some landscape features that have been lost as a result of agricultural intensification.

- 4.4 There is also a requirement to prepare and submit an Environmental and Conservation Management Plan. This will introduce positive management of natural habitats within the site which might otherwise deteriorate.
- 4.5 Promotion of the development will draw attention to and increase awareness of the WHS and will undoubtedly attract additional visitors to the general area and to the WHS. The proposal will provide high quality accommodation and other visitor services meeting an identified need on the North Coast which will benefit visitors to the WHS who choose to use them.

Department of the Environment (Northern Ireland)
22 February 2012



Department of the
Environment

www.doeni.gov.uk

From the
Permanent Secretary
Leo O'Reilly

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Your reference:
Our reference: PSE: 0047.12

21 February 2012

Dear Paul

**STATE OF CONSERVATION OF THE GIANT'S CAUSEWAY AND CAUSEWAY
COAST WORLD HERITAGE PROPERTY**

I write in response to the correspondence from Kishore Rao which was referred to my Department on 6 February 2012. I note that the World Heritage Centre has requested comments and detailed information about the planning application for a hotel and golf course. In line with our wish to inform the World Heritage Centre through DCMS of the outcome of this application, I am writing to let you know that the Department has now decided to approve the application.

My Department is preparing a report to outline this project and how a decision to approve was taken in the context of provisions to protect the World Heritage property. This report will be provided within four weeks.

In the meantime I should advise you that my Department has carefully considered this application. It has fully assessed the development proposals and the environmental information contained in the Environmental Statement and subsequent Addenda, the comments of all consultees, letters of objection and support, and had regard to the relevant planning policy context, the statutory development plan and draft development plan and all other relevant material considerations.



It is acknowledged that the nature of the proposal is such that it will have a significant landscape and visual impact on the setting of the Giant's Causeway and Causeway Coast World Heritage property, and the Causeway Coast AONB. However the Department considers that the amended scheme has reduced its prominence.

The proposal will have significant benefits for the tourism industry and will fill a gap in tourist infrastructure and accommodation along the north coast. It will also represent a very significant boost to the local economy through direct and indirect job creation. On balance it is concluded that these benefits are sufficient to outweigh the impact on the landscape, including the setting of the WHS, and other issues.

The State of Conservation report which is to follow will provide more detail about the proposal and the decision. It will also provide an updated and full account of the planning policies, progress of the development plan and any other relevant provisions for protecting the Outstanding Universal Value of the World Heritage property.

Yours sincerely,

A handwritten signature in black ink on a light pink rectangular background. The signature reads "Leo O'Reilly" with a horizontal line underneath.

LEO O'REILLY

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Kishore Rao
Director, World Heritage Centre
UNESCO
7 Place de Fontenoy
75352
Paris 07 SP
France

22 March 2012

Dear Kishore

**STATE OF CONSERVATION OF THE WORLD HERITAGE PROPERTY
"THE GIANT'S CAUSEWAY AND CAUSEWAY COAST" (UNITED
KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND)**

I wrote to you on 22 February about the World Heritage Property "Giant's Causeway and Causeway Coast" and the proposed development of a hotel and golf course in the vicinity of the site.

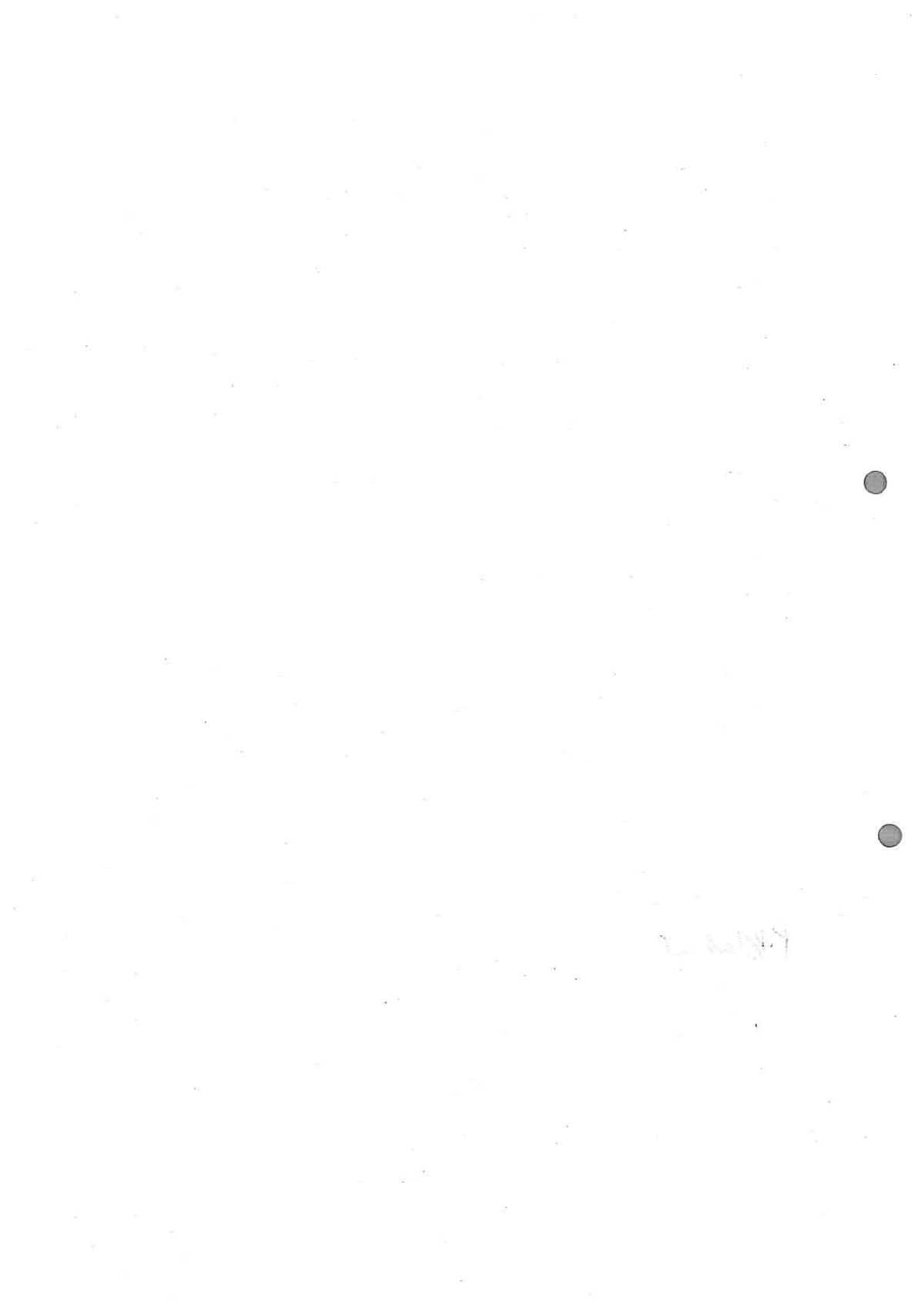
I am now attaching a report from the Department of the Environment in Northern Ireland which provides further information about this project and other issues. Please let me know if we can provide any further information.

Yours sincerely



Paul Blaker
Head of World Heritage

cc: H.E Mr. Matthew Sudders, the Permanent Delegate of the United Kingdom to UNESCO
UK National Commission for UNESCO
Susanna Allen, Department of the Environment, Northern Ireland





Department of the
Environment

www.doeni.gov.uk

GIANT'S CAUSEWAY AND CAUSEWAY COAST (UNITED KINGDOM) (N 369)

Background

The Giant's Causeway and Causeway Coast World Heritage Site (WHS) was inscribed as a natural site in 1986 on the basis of its demonstration of two outstanding universal values summarised as geological phenomena and natural beauty. The features of geological and geomorphological interest which are globally significant are fully represented within the property. While the natural beauty is related to the cliff exposures of columnar and massive basalt within the site, this is set within more extensive coastal scenery.

The World Heritage Centre has been aware since its mission to the site in 2003 that a development was under consideration of a hotel and golf resort in the vicinity of the WHS. This was reported on in a State of Conservation report submitted on 1 February 2010. Northern Ireland's Minister of the Environment announced on 21 February 2012 that he had authorised a Notice of Opinion to approve planning permission for this development.

The development and its location

The Department of the Environment in Northern Ireland is currently the Planning Authority (though this function is now proposed to devolve to new Local Authorities in 2015). The application that has been approved by the Department is for full planning permission for a golf resort including an 18-hole championship golf course, clubhouse, golf academy and driving range, 120 bedroom hotel and 75 guest suites.

The core of the development site, of approximately 148 hectares, is located about 2 km to the south of the Giant's Causeway visitor centre and to the north and east of the settlements of Bushmills and Portballintrae. The golf course will extend to just over 0.5 km from the boundary of the World Heritage property. The site currently consists of a number of undulating agricultural fields of various sizes, areas of dune grassland and an area of woodland known as the Esthersfield Plantation. The Bush River is adjacent to the southern and western boundaries with Whitepark Road and Causeway Road adjacent to the eastern and northern boundaries.

The site is located within the Causeway Coast Area of Outstanding Natural Beauty (AONB). The site also lies within the buffer of the World Heritage property identified as the Distinctive Landscape Setting for which protective policies have been proposed in the draft Northern Area Plan.

The Department carefully considered the application. It fully assessed the development proposals and the environmental information contained in the Environmental Statement and subsequent Addenda, the comments of all consultees, letters of objection and support, and had regard to the relevant planning policy context, the statutory development plan and draft development plan and all other relevant material considerations in reaching a recommendation.

Impacts on the World Heritage Site and its setting

A number of consultees to the planning application expressed reservations in relation to the potential for the proposal to have a significant landscape and visual impact on the setting of the WHS. They noted that the planning application will introduce large scale buildings and elongate the built form of Bushmills, while the golf course will change the character of the development site from its rural, farmed landscape. This will be evident when viewed from parts of the WHS and approaches to it.

The site is clearly visible from various vantage points in the immediate vicinity including the approaches to the WHS. There are also panoramic views of the site from the Giant's Causeway car park and from the cliff walk above, though views from here to the built elements are over a distance of approximately 2 km. It has been acknowledged that the nature of the proposal is such that it will have a significant landscape and visual impact on the setting of the WHS, and the AONB.

The Department has sought to work with the developers to ensure that the proposal is as visually integrated as possible into its surroundings and that mitigation proposals are practical, appropriate and deliverable. The amendment to the original application has reduced its prominence considerably. The Department's Design Unit has been involved in negotiations with the applicant to secure a better design and achieve maximum integration of the scheme into the landscape. The Department's Landscape Architects are content with the revised landscape management plan.

These amendments have taken account of potential impacts on the landscape setting of the WHS. The major built form elements of the scheme have been moved closer to Bushmills and away from the WHS. A detailed Landscape Management Plan will help to reduce the landscape and visual impact.

In arriving at a decision to approve this proposal, the Department has sought to retain and to make the most of the heritage resources of the site. Through the use of conditions on

the planning approval, it is intended that positive benefits can be realised. The developer will be required to deliver the landscape management plan for a 20 year period, the objective of which is to sustain and enhance the landscape and secure the better visual integration of the development. The proposed conditions include measures to protect landscape features, such as the woodland, which are currently not subject to planning control or positive management. The developer also intends to restore some landscape features that have been lost as a result of agricultural intensification. There is also a requirement to prepare and submit an Environmental and Conservation Management Plan. This will introduce positive management of natural habitats within the site which might otherwise deteriorate.

While a development of this scale will always have an impact on the landscape, the changes to the position and design of the elements of the proposal in conjunction with retention and enhancement of the existing vegetation will undoubtedly reduce the visual impact of the scheme and its impact on the setting of the property which contributes to part of its outstanding universal value.

Promotion of the development will draw attention to and increase awareness of the WHS and will undoubtedly attract additional visitors to the general area and to the WHS. The proposal will provide high quality accommodation and other visitor services meeting an identified need on the North Coast which will benefit visitors to the WHS who choose to use them.

The status of planning policy for the buffer zone

The importance of the WHS and its setting is recognised and provided for in both regional planning policy and the emerging development plan for the area. Planning Policy Statement 6: Planning, Archaeology and the Built Heritage policy BH5: The Protection of World Heritage Sites states that "The Department will operate a presumption in favour of the preservation of World Heritage Sites and that development which would adversely affect such sites or the integrity of their settings will not be permitted unless there are exceptional circumstances."

There have been significant delays in progressing the draft Northern Area Plan, in which the WHS lies due to two judicial challenges. These have now been resolved and Independent Examination of the plan is currently being conducted by the Planning Appeals Commission (PAC). The emerging Northern Area Plan contains designations and policies relating to the WHS which recognise and seek to protect its landscape setting. Current policy proposals would confine development to essential facilities within the WHS and modest facilities necessary to meet visitor needs within the Distinctive Landscape Setting. The plan will not however be finalised and adopted until after the Department receives the report which is expected in 2013.

The Department does not consider that the decision which was taken on the basis of exceptional circumstances will set a precedent for a similar type of development within the setting of the WHS. It remains committed to retaining and implementing the protective policies for the WHS and its setting.

2. Other issues

Visitor Centre 2012

The new visitor centre at the Giant's Causeway is due to be completed by July 2012 bringing the international competition winning design by heneghan.peng architects to fruition. Delivery of this distinctive and exceptionally high quality facility within schedule is a significant achievement by the National Trust which is the major landowner and primary manager of the property. The development is restricted to a brown field site and the high quality building is intended to blend into the landscape and be as sustainable as possible. Local stone has been sourced for the building façade, innovative non-carbon based heating and cooling systems have been installed, the concrete structure uses over 70% recycled product and the accessible grass roof which integrates the building in the natural topography is to be planted using locally gathered grass seed.

The building will contain state of the art interpretation looking at how the Causeway was formed, the natural life of the area and information about local people and their stories including the canon of Irish mythology. The building will also provide catering, retail and information services. Importantly, the new facility will form part of the National Trust led fully integrated visitor management provision for the site that encompasses the amenity areas, the WHS and beyond and the adjacent Causeway hotel. It is expected that the new facility will be open to the public from July 2012 onwards with an official opening later in the year. Further details can be seen at <http://agiantcause.nationaltrust.org.uk/>

Park and Ride

To ensure that there is adequate provision for visitors without increasing the footprint of visitor facilities on or close to the World Heritage property there is now a car park in Bushmills with a shuttle service. Variable messaging signage on the approach to the property directs visitors to use this facility during busy periods to reduce congestion at the property and avoid the need for development on green field sites close to it. This, alongside investment for regeneration in Bushmills, will enhance the offerings for and economic benefits from visitors.

Management

The first Management Plan for the site was published in 2005. It is currently under review and a draft revised plan will be issued by April 2012. Following a consultation period to include consideration by IUCN UK and DCMS it will be finalised. A final draft of the plan will be sent to the World Heritage Centre.

From July 2011 a part time WHS Officer has been employed by the Causeway Coast and Glens Heritage Trust with funding from the Department. While the Officer has initially focussed on leading the review of the management plan she is already facilitating greater engagement with the local community and with managers of other World Heritage properties. The post will also support delivery of the revised plan. A new website has been prepared to draw attention to the Giant's Causeway property and to facilitate consultation on the draft management plan. It can be viewed at <http://www.giantscauseway.ccght.org/>

Marine area

The Skerries and Causeway Inshore Special Area of Conservation (SAC) has been proposed to include the marine area of the World Heritage property and beyond. Conservation Objectives and Advice on Operations have been drafted and the proposed SAC is already a consideration in development decisions which will strengthen protection of the marine aspect of the WHS.

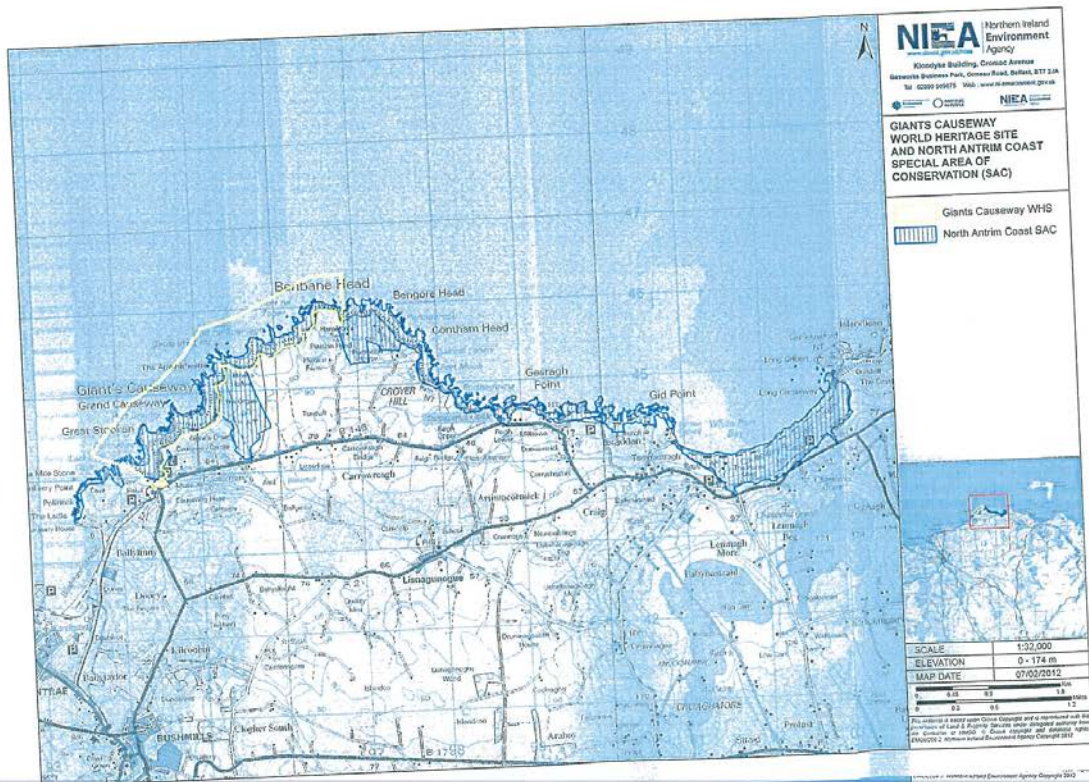
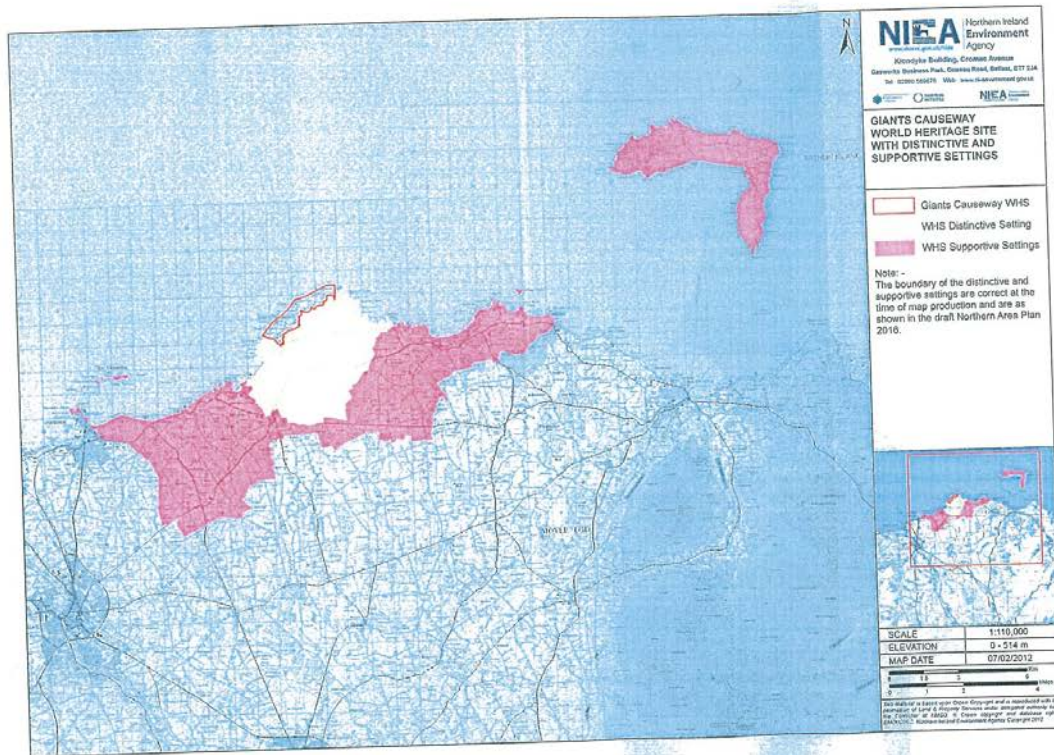
Evidence to inform management

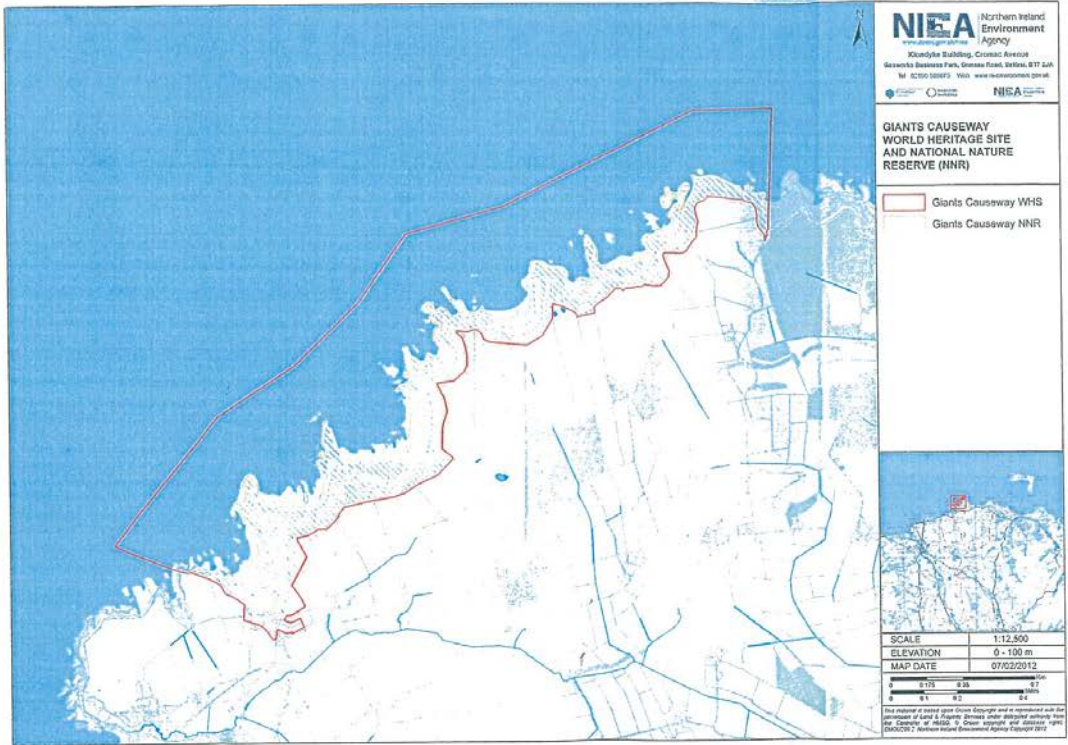
The site is naturally dynamic and combined with the high numbers of visitors this continues to provide a management challenge as recognised in the management plan. The need to develop a geographical information system to provide vital information for day to day management of the site was identified. Queen's University Belfast and the National Trust are supporting a PhD student to carry out a study on 'Digital Documentation of Natural Heritage for Integrated Hazard Assessment and Sustainable Management at the Giant's Causeway and Causeway Coast World Heritage Site'.

The project involves digital documentation within one GIS package through the collection of natural heritage data in combination with a high resolution digital elevation model and slope failure and visitor data collected digitally using GPS technology. This has created an information management tool which enables development of integrated hazard assessment techniques to provide site managers, stakeholders and members of the public with up-to-date reports and visual outputs. It can also be integrated with a range of climate scenarios for the short, medium and long term. This tool is already being used to inform sustainable site management and has significant potential to serve as a model management tool for other World Heritage properties.

ANNEX V: Maps of the World Heritage Site and other protected area designations







ANNEX VI Review of the recommendations – joint IUCN UNESCO Mission 2003

Conclusions 2003	Recommen. 2003	Status	Comments
<p>1.The landscape setting is crucial for the conservation of the natural beauty.</p>	<p>a) All zoning arrangements to preserve the landscape values of the AONB surrounding the WHS need to be carefully reviewed.</p>	<p>Not yet fulfilled.</p>	<p>A)Zoning concept for the landscape area, including a buffer zone of the WHS, still not formally adopted;</p> <p>B)There are, however, provisions for different zones («distinctive» and »supportive« settings) adjacent to the WHS in the draft Northern Area Plan (dNAP); »Distinctive Landscape Setting« for the WHS is defined within draft Northern Area Plan by Countryside Policy 11 (COU 11). The Planning Appeals Commission has yet to report on the Inquiry and DoENI will formally adopt the plan (which could take several months).</p> <p>C)Even if the concept of zoning is proposed in the dNAP, and COU 12 proposes that <i>»no development within the Distinctive setting of the WHS outside existing settlement limits will be approved«</i> apart from <i>»exceptionally modest scale facilities«</i>, some <i>»extensions to dwellings«</i> and limited <i>»replacements of existing occupied dwellings«</i>, planning permission for a major golf resort within this zone, exceeding the extent of the above three exceptions to any development in Distinctive setting zone, raises the question of actual efficiency of the Distinctive setting zone in achieving protection of the OUV of the WH property and its integrity.</p>
	<p>b)No development, which could</p>	<p>Not fulfilled.</p>	<p>D)Planning permission was granted in March 2012 for a major golf resort in the »Distinctive Landscape Area«, the</p>

	<p>potentially threaten these values, should be allowed.</p>		<p>area which »forms the immediate setting and is significant in views to and from the site« and also »areas of land which fall into »distinctive« category which do not have continuous views of the WHS (dMP, 2013)«.</p> <p>The assessment made by the State Party on the development regarding the World Heritage Site, states that: "It is acknowledged that the nature of the proposal is such that it will have a significant landscape and visual impact on the setting of the Giant's Causeway and Causeway Coast World Heritage property, and the Causeway Coast AONB." (letter provided to UNESCO 22 February 2012).</p>
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Conclusions 2003	Recommendations 2003	Status	Comments
<p>2.The provisions of the Operational Guidelines concerning the conditions of integrity of a natural WH property fully taken into consideration.</p>	<p>c)Establishment of an appropriate and clearly defined buffer zone (could be linked to the proposed zoning plan of AONB).</p>	<p>Not fulfilled.</p>	<p>E) The WHS is located within the »Causeway Coast & Rathlin Island Landscape Character Assessment« which is a means of describing the variation in landscape character and the components which make it special (dMP, 2013). Key visual characteristics of this area include high plateau landscape, exposed sheep-grazed landscape, rural landscape with villages associated with coastal bays and ruined castles on cliff top (LCA, no date of publication).</p>

			F) Buffer zone, where »biophysical processes and landform features should be relatively intact« as stated in the Operational Guidelines (OG, 2008) to secure integrity of the WHS, still has not been adopted, and even in the proposed Distinctive Landscape Area (which could perform the role of the buffer zone to the WH property) changes in the landscape are permitted in order to construct a development.
Conclusions 2003	Recommendations 2003	Status	Comments
3a. Values for which the site has been inscribed have been preserved.	None		
World Heritage criterion (viii)		Retained.	G) Values related to the criterion viii are maintained.
World Heritage criterion (vii)		Threatened.	H) Values related to the landscape setting of the property, which support its Outstanding Universal Value and is visible from the cliff top section of the site, will potentially be negatively impacted by development. See the above statement .

Conclusions 2003	Recommendations 2003	Status	Comments
3b. The property is a dynamic geological site with on-going geological processes and coastal erosion phenomena,	None	Maintained.	I) In-situ geological and geomorphological processes in place. J) Natural threats (sea water rise, frequency of storm events) due to expected climate change carefully monitored and mitigation measures

which have to be managed as such.			considered in the draft MP.
3c. Continues scientific research both on the geological values and ecosystems which provide baseline information for effective management of all values of the property in place.	d) Relevant bodies provide research results to the management bodies.	Fulfilled.	K) Several research studies and monitoring undergoing.
Conclusions 2003	Recommendations 2003	Status	Comments
4. State of conservation of the state be enhanced	e) The authorities concerned to continue enhancing the state of conservation of the site (WH property)	Partly fulfilled.	L) Despite many visitors and acting natural forces (erosion, sea-water rise and frequency of storms, both related to Climate Change) the property itself (geological features and processes) is not threatened. The same could not be said for the WHS integrity, especially its wider landscape.
	f) The authorities concerned to continue enhancing the state of conservation of the AONB	Partly fulfilled.	M) State of conservation of the AONB is under the responsibility of DoENI. AONB includes the Distinctive Landscape zone which is under threat due to potential major developments.
	g) The authorities concerned to continue enhancing the state of conservation of the seascape linked to the site	Fulfilled.	N) The WHS benefits from extensive »Seascape Setting« as defined in the 2005 site Management Plan. This marine area is currently under consideration as candidate marine Special Area of Conservation (dMP, 2013).

Conclusions 2003	Recommendations 2003	Status	Comments
5.Coordinated approach involving engagement of the authorities and stakeholders is required to secure effective management of the WHS.	h)Consistent site management plan for the WHS in place.	Partly fulfilled and pending issue.	O)Management plan (MP, 2005) has been adopted for the period 2005 – 2011. Currently a new MP is under preparation for the period 2013 – 2019. The preparation of the plan is overseen by the WHS Steering Group, led by the DoENI representative, where all major stakeholders and property rights owners are represented. It is expected that MP will be adopted very soon in the next months
6.Protection of the integrity of the WHS secured.	i)Zoning, including definition of the buffer zone to the WH property, to be identified.	See points 1 and 2 above.	
	j)Possible revision of the current WH property to be considered.	Requires review.	P) Revision of the WHS boundaries should be undertaken, in order to include a larger portion of the cliff top. The State Party notes that this was considered in 2009, and it was determined to not seek an extension at that stage. The current mission considers however that this proposal could be further considered.

7.Effective governance model for the WHS in place.	k)To establish a management committee for the WH site.	Fulfilled.	Q)Key organisations with interest, ownership and legal rights to the WHS are represented at the WHS Steering Group.
8.Coordination of site management and reporting process	l)To appoint WH Site manager.	Requires clarification	R)In April 2011 a WHS Officer was appointed and it works in close relationship with the WHS Steering Group. The National Trust also has a property manager who is responsible for day to day management of the site. Furthermore the WHS Steering Group is responsible for the implementation of the Management Plan. The respective responsibilities of these different people/ organizations for the management of the WH property could be further clarified.

Conclusions 2003	Recommendations 2003	Status	Comments
9.Consistent tourism management within WH property in place.	m)New visitor centre located at the entrance of the site.	Fulfilled.	S)In July 2012 a new visitor centre was opened at the entrance to the site. The centre is managed by the National Trust, which owns, leases and manages approximately 95% of the terrestrial portion of the WH property (dMP, 2013).
	n)To deliver appropriate signage with a clear WH message.	Fulfilled.	T)Signs, indicating the WH status of the property, posted at the key points of the property and at several places in its vicinity.
	o)To upgrade appropriate infrastructure.	Fulfilled.	U)Although new visitor centre is a major visitors infrastructure, there are several other new or improved facilities, including the Causeway Hotel, improved trails and visitor's information system, local transport etc.
10.Development proposals process placed within a context of approved management plan.	p)Any development proposal should not be approved before the buffer zone to the WHS is approved and management plan for the site put in pace.	Not fulfilled.	V)Permission for construction of the golf resort issued before approval of the WHS management plan and without prior consultation with UNESCO.
11.WH has to be seen in the regional context and should provide benefits for local communities and	q)Diversification of tourism facilities which would not impact the OUV should be considered.	Partly fulfilled.	W)Although DoENI and tourism sector consider golf industry as the major driving force of tourism development for the wider area, at the same time the importance is given to the preservation of the WHS property in its core zone (but not also to the OUV

visitors alike.			and the integrity of the site).
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Conclusions 2003	Recommendations 2003	Status	Comments
12. Creation of additional access points	r) Dunseverick Castle could be considered as an access point.	Not relevant.	Y) With opening of the new visitor centre at the entrance of the site in 2012, proposed additional access point should be seen only as an additional, rather than an essential opportunity.

ANNEX VII Photographic documentation



Photo 1: View from the existing golf course to the area of the proposed major golf development and the property in the background



Photo 2: View from the visitor centre. The proposed golf development is planned in front of the village



Photo 3: Causeway Coast with the Causeway Hotel and the entrance to the visitor centre



Photo 4: Entrance to the new visitor centre resembling basalt columns



Photo 5: UNESCO signs at the entrance to the visitor centre



Photo 6: UNESCO World Heritage logos are missing on some outdoor signs



Photo 7: Diesel bus, once available only to the disabled, but now offered to all visitors



Photo 8: The main road for visitors and diesel buses is not separated



Photo 9: Causeway stones, under on-going forces of erosion. Visitation is high but no vandalism is reported



Photo 10: Landslides along the road are the main threat for visitors and the main concern for maintenance