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# Report on the joint UNESCO/ICOMOS/ICCROM Advisory mission to the World Heritage property “Royal Tombs of the Joseon Dynasty” (Republic of Korea)

13-17 March 2023



## Acknowledgements

The mission team wishes to extend its sincere thanks to the authorities of the Government of Korea, and especially the Cultural Heritage Administration of the Republic of Korea (CHA), for inviting this Advisory Mission to the Royal Tombs of the Joseon Dynasty and for its continuous support throughout the mission.

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Finally, the mission expresses its gratitude to the Permanent Delegation of the Republic of Korea to UNESCO, who further facilitated the organisation of this mission.



*Seoreung Tombs Cluster*

## Executive Summary

### Background

The Royal Tombs of the Joseon Dynasty were inscribed on the World Heritage List in 2009 (Decision [33 COM 8B.15](#)) under Criteria (iii), (iv) and (vi), as a collection of 40 tombs at 18 locations, built from 1408 to 1966. Areas of outstanding natural beauty were chosen for the tombs, which typically have their back protected by a hill as they face south toward water and, ideally, layers of mountain ridges in the distance. Alongside the burial area, the royal tombs feature an entrance, a ceremonial area, and associated buildings. The Joseon Tombs complete the 5,000 year history of royal tombs architecture in the Korean peninsula.

Between 2019 and 2022, the World Heritage Centre received a series of third-party communications regarding development projects at several component parts of the property and reached out to the State Party for confirmation and requested further information. Based on the exchanges with the Republic of Korea, on 25 March 2022, the World Heritage Centre requested the State Party to provide a report on the state of conservation of the property for consideration by the World Heritage Committee at its upcoming extended 45th session (Riyadh, 10–25 September 2023).

In parallel, CHA expressed its interest in inviting an Advisory mission to the property to assess the consequences of major developments that may affect three clusters of the property and provide advice on measures to be taken in that regard. A joint Advisory Mission was organised on 13–17 March 2023 and focused on the impacts and possible mitigation measures for the following major developments:

- Construction of an apartment complex in the buffer zone of Gimpo Jangneung cluster;
- Public housing and commercial projects proposed near the buffer zone and in the setting of Taereung cluster;
- Public housing and commercial projects proposed near the buffer zone and in the setting of Seooreung cluster.

### Outstanding Universal Value of the Property

The Statement of Outstanding Universal Value for this World Heritage property opens with the following: "The natural surroundings of the Royal Tombs of the Joseon Dynasty, shaped by the principles of *pungsu*, create a delicate setting for the living tradition of ancestral worship and its associated rites". The World Heritage Committee inscribed the component sites of this serial property for their "integrated approach ... to nature and the universe" and "the retention of the natural landscape" (Criterion (iii)) that responded to sacred geomantic (*pungsu*) principles which have guided the selection, construction and use of these sites to the present day. As such, the inscribed Royal Tombs were not inscribed so much for the intrinsic value of each individual building or Tomb site, but for their expression of principles that remain applicable today: "in their response to settings and in their unique (and regularized) configuration of buildings, structures and related elements, [the tombs] manifest and reinforce the centuries old tradition and living practice of ancestral worship through a prescribed series of rituals" (Criterion (iv)). It should be noted that the view lines from the level of the funerary mounds to the Ansan mountain are no less important because they are not seen by most visitors: the exclusivity of the view from the tomb itself is an integral part of the Royal Tomb's sacred landscape and reflection of *pungsu* principles.

While the mission considers that none of the factors currently affecting individual component sites would, in and of themselves, be of sufficient gravity to jeopardise the World Heritage status of the property, it is the cumulative nature of these threats across all visited component sites, and quite possibly at others, that represents the greatest concern for the mission. Consequently, the mission expressed concerns that the property would likely satisfy the criteria for potential and/or ascertained danger, in the spirit of Paragraphs 178-179 of the *Operational Guidelines for the Implementation of the World Heritage Convention* (inscriptions on the List of World Heritage in Danger).

Further assessment is required of both tangible and intangible aspects of the OUV that could be at risk. This should include potential impacts on the integrated approach to nature and the universe that created a unique and important funeral tradition associated with the Royal Tombs.

#### *Jangneung Cluster*

The Jangneung Cluster has attracted the most attention from civil society due to the completed construction of a new high-rise development (the Incheon Seo-gu Wondang-dong Geomdan New Town Housing Construction Project) that includes buildings within the buffer zone of this component cluster of the World Heritage property. At the time of the mission, CHA was engaged in legal proceedings against the three private development organisations.

The overall physical conservation of the structures on the site and the state of the landscape elements within this component of the property are excellent. However, the mission is concerned that, even if the buffer zone constructions had been prevented, there is no statutory authority to control impacts on the OUV of the Royal Tombs of the Joseon Dynasty in the wider area around the component clusters, particularly in the wider setting of the component sites. As a result, significant impacts on OUV have occurred and can continue to occur, including from extensive high-rise developments outside the buffer zone.

Equally concerning is the fact that a development with such significant impacts on an internationally recognised and protected site could occur without the knowledge or involvement of CHA, as the primary responsible authority for the protection of World Heritage properties. This demonstrates the key importance of expanding the radius and reach of legal protection mechanisms, so that heritage authorities can be part of a conversation about the protection of key attributes of the sites, including its relationship with its wider setting, as early as possible to prevent any such situation from occurring in the future.

The impacts on the Jangneung Cluster cannot be easily mitigated without the removal of the new development, which would be politically, economically and socially unfeasible. Nonetheless, the outcomes of ongoing litigation could provide an opportunity to create a nationally focussed discussion of the importance of national heritage and of World Heritage status, including obligations under the *World Heritage Convention* (notably Articles 4 and 5).

#### *Seooreung Cluster*

The Goyang Changneung New City Project, announced in April 2019, proposes high-rise apartments and commercial structures on land that lies to the west and south of the heritage area, encroaching on the south-west edge of the buffer zone. While some welcome revisions to the heights of housing projects resulted from negotiations between CHA and the developers, the mission was informed that the heights of commercial buildings would not be changed, even though it was shown that a structural node of commercial development would create a significant visual impact at the Gyeongneung and Myeongneung Tomb sites. The possibility of reconsidering the impact of the height and clustering of the commercial zone buildings should

be considered to avoid any impact on the OUV. There is one large commercial development in the New City Project, which will encompass a new train station and the central business zone.

The HIA for the Seooreung Cluster is currently only considering view lines, with a more comprehensive impact assessment to follow. While the view line and setting impact is likely to be the greatest threat, a staged investigation compromises a timely and holistic approach and a more considered iteration of responses.

It was evident that the impact of the road and village directly in front of the Changneung Tomb already produces considerable visual, traffic, noise, and potential pollution threats. Albeit present at the time of the listing, the road and its accompanying activity and structures create a visual and auditory impact that is negative. The project will likely lead to a rise in population density, bringing about a flow-on increase in environmental impacts: increased vehicular traffic, environmental pollution, noise and light pollution, and even increased visitation at the component site. These should be thoroughly taken into consideration in the HIA process.

There is one large commercial development in the New City Project, which will encompass a new train station and the central business zone. The mission was informed that the heights of the commercial buildings will not be changed, including due to financial considerations, even though it was shown that this structural node would create a significant visual impact at the Gyeongneung and Myeongneung Tomb sites, reaching 54 metres above the skyline at both tombs. The mission determined that the possibility of reconsidering the impact of the height and clustering of the commercial zone buildings should be considered.

Further assessment is required of both tangible and intangible aspects of the OUV that could be at risk. It should also include an understanding that the view lines from the level of the funerary mounds to the Ansan mountain are no less important because they are not seen by most visitors. The exclusivity of the view from the tomb itself is an integral part of the Royal Tomb's sacred landscape and reflection of *pungsu* principles.

The possible interpretation of the missing bridge and pond, currently proposed for the buffer zone development area, should be pursued through archival and archaeological investigation to determine where the original pond and bridge were located, whether or not it was in the buffer zone. Once this has been determined, an appropriate interpretation should be provided.

The HIA should also be directed to the proposed development within the buffer zone area.

#### *Taereung Cluster*

The Seoul Taereung Public Housing Zone Project, proposed in August 2020, envisages the construction of high-rise apartments and commercial structures on land that was the Taereung Golf Course. Negotiations between the developers, CHA and other stakeholders have resulted in a decrease in the proposed number of residential units (6,800 down from 10,000), which is reflected in decreased heights. Here as well, the mission was informed that the heights of non-housing, commercial buildings planned for construction in the project should not be changed. The mission also noted that the developers will remove three broadcast towers that create a visual intrusion in the setting of the property, which is a welcomed action.

The option of extending the Royal Forest depth should be discussed further with the developer and MOLIT, including the potential need to acquire additional land, to ensure that neither historical landscape prescriptions for the Royal Tombs nor other ownership rights are compromised or introduce additional impacts.

### *Taereung National Sports Training Centre*

At the time of inscription, the State Party committed to the removal of both the shooting range and National Sports Training Centre, located within the Tuareng Component, between the Gangneung Nungchim and Taereung Nungchim tombs. Several facilities in the Training Centre have now been demolished.

In 2020, the Korean Sports and Olympic Committee tabled a document recognising four facilities within the Training Centre as having cultural heritage values and intends to retain, maintain and reuse the buildings, including as an interpretation site for Taereung Cluster. The mission considers that these facilities, although located within the core heritage area, will not detrimentally impact the OUV of the Royal Tombs of the Joseon Dynasty and present a welcome case of reuse of valuable heritage. The retention of some facilities to recognise the national-level heritage importance of the National Sports Training centre should be supported.

The potential to use the structures for interpretation of both the Royal Tombs and sports heritage, and future uses and management, should be outlined in a management plan for the precinct and provided to the World Heritage Centre for review by the Advisory Bodies.

### *National Protection and Management Systems for the World Heritage Property*

In the spirit of Paragraph 118bis of the *Operational Guidelines*, it is essential that major development and other projects in the vicinity of the property, even in the wider setting, be subject to impact assessment requirements, even if the geographic location of the project is not within or is immediately outside of the buffer zone of the component sites but may nonetheless have an impact on any component site of a property.

Heritage Impact Assessments (HIAs) for the Seoreung and Taereung Clusters should be completed as a matter of priority, focusing on all aspects of potential impact on OUV, including the cumulative impacts of these and previous development projects in the vicinity (e.g. impacts of increased pedestrian and vehicular traffic in the area, pollution, noise, visitation), and addressing all three inscription criteria. Most importantly, the recommendations of an HIA must be considered and acted on by the concerned developer(s).

The mission was informed that an amendment has been proposed to alter the "Special Act on World Heritage" to include a statutory imperative for a HIA system. This legislation should provide a clear understanding of when an HIA should be prepared and how the HIA preparation is triggered, incorporating clarifications on the concept of the wider setting with an understanding that impacts to OUV can occur outside the specified boundaries of the World Heritage property, its component sites and any buffer zones, or their equivalents in the national legislation. Consultations and communication should occur between CHA and the concerned local governments and other national government agencies to give them a better understanding of the concepts of both buffer zones and wider settings. While mitigation recommendations are important, the HIA recommendations should also allow for the option of the action/development not proceeding in any form.

If at all possible, it should be ensured that the legislation takes into account the principles, methods and approaches to impact assessments and protection for World Heritage outlined in the *Guidance and Toolkit for Impact Assessments in a World Heritage Context* (2022), in an effort to avoid further revisions of the legislation in short succession.

To make these requirements clear and as binding as the legal system will permit, the mission considers that straightforward, practically oriented and proactive communication about the

implications of an inscription under the World Heritage Convention is essential and should be widely disseminated.

As expressed during the mission, the World Heritage Centre and the Advisory Bodies stand ready to provide further guidance to the State Party in that regard, along with any required capacity building for HIAs.

### *Conclusions*

The CHA is endeavouring to achieve stronger protection for the World Heritage property "Royal Tombs of the Joseon Dynasty" and its component clusters within a political, economic and social environment that seeks to alleviate demand for residential and commercial expansion within Seoul and its immediate surrounds.

The Royal Tombs component clusters present as undeveloped and 'green' areas in these locations, and hence as attractive options for alternative use. Unfortunately, the current statutory protections and guidelines for development around the component clusters do not extend outside their buffer zones.

Although development had already occurred around some clusters at the time of listing (2009) and was identified as a continuing threat, there has been no mechanism to control additional construction outside of the buffer zone, as is evident at the three component clusters visited. The mission found significant housing and commercial development projects, whether recently completed or in the planning stages, to represent substantial threats to the overall OUV of the property, which was inscribed for the relationship between the tombs and their environment, based on geomantic *pungsu* principles according to which the sites were selected and constructed (and eventually inscribed on the World Heritage List). The mission also found that, since the very intrusive new developments, particularly at the Jangneung Cluster, affect these *pungsu* principles, they also affect the living heritage aspects at the sites, which have been in near-continuous use since their creation, with rituals and ceremonies being regularly held to this day. It is a concern of the mission that similar situations with recent, ongoing or planned developments located on the outer limits of the property's buffer zones or in the wider setting of the component sites are likely to be found at some (or even many) of the other 15 tomb clusters.

The mission shares the concerns expressed by the CHA regarding the impacts of ongoing litigation on the protection of the property, and the precedents that could be set for other World Heritage properties in the Republic of Korea, and largely supports the arguments presented by CHA in its summary of past and ongoing legal cases involving new developments.

The mission therefore welcomes the fact that the current circumstances appear to have led to a more active public response due to the size of the developments and direct encroachment on buffer zone areas.

Relevant legal instruments, policies and procedures, and stakeholder discussions for the management of World Heritage properties and their OUV require a greater consideration of:

- how and when to undertake Heritage Impact Assessments;
- the implications of the wider setting of component sites and its potential impacts on the overall OUV of the property;
- a broader consideration of the attributes that make up the OUV of a property and how they can be impacted.

It is essential that major development and other projects in the vicinity of the property, even in the wider setting, be subject to such requirements, even if the geographic location of the project is not within or immediately outside of the buffer zone of the component sites, but may nonetheless have an impact on any component site of a property.

To make these requirements clear and as binding as the legal system will permit, the mission considers that straightforward, practically oriented and proactive communication about the implications of an inscription under the World Heritage Convention is essential and should be widely disseminated.

It is of particular concern that the mission found similar factors affecting all three visited component clusters, albeit with varying degrees of gravity, urgency and impact on the key attributes of OUV. Significant housing and commercial development projects, whether recently completed or in the planning stages, represent substantial threats to the overall OUV of the property,

Despite the CHA's excellent management of the inscribed component sites within their boundaries, its capacity to adequately protect the clusters from significant impacts that often arise several kilometres away from these clusters is clearly limited by the scope of its legal and management purview. This complex issue should be addressed as much and as quickly as possible, including through proactive dialogue with stakeholders and mandatory impact assessments. Indeed, based on the limited selection of visited sites, the mission is concerned about the potential risk that such issues could gradually erode key attributes of OUV, especially if they occur across a number of component clusters and negatively impact the *pungsu* principles that are the core of the OUV to such a degree that the property as a whole may eventually no longer be able to express fully its OUV

It is a concern of the mission that similar situations with recent, ongoing or planned developments located on the outer limits of the property's buffer zones or in the wider setting of the component sites are likely to be found at some (or even many) of the other 15 tomb clusters.

In accordance with Paragraphs 178-179 of the *Operational Guidelines*, the World Heritage Committee can consider a cultural World Heritage property to be in danger, and therefore inscribe it on the List of World Heritage in Danger, if it faces ascertained or potential danger. While it was not the purview of this mission to make such a determination in the case of the Royal Tombs of the Joseon Dynasty, it is concerning that, based on the component sites visited, the property would likely qualify for consideration under some of the criteria identified in Paragraphs 178-179.

Finally, the mission notes that the World Heritage Committee is set to review the state of conservation of the property at its extended 45th session (Riyadh, 10–25 September 2023), and that the Committee may consider the outcomes of this mission report in its deliberations. It should however be emphasized that the mission only visited three of the component clusters of the property, all of which showed some degree of impacts from urban expansion and development; however, the mission's purpose was not to review the state of conservation of the entire property, but the mission considers that this would represent an essential next step to determine how many clusters are affected by similar issues, in view of its findings.

### *Recommendations*

In view of the above, the mission recommends the following:

1. The CHA should reinforce its communication with relevant government entities concerning the obligations incumbent on the Republic of Korea as a signatory to the World Heritage Convention, and notably Articles 4 and 5 of the *Convention*, as well as Paragraphs 118bis and 172 of the *Operational Guidelines*.
2. Ongoing Heritage Impact Assessments for several component sites should be carried forward as a priority and expanded from the current focus on view lines to consider a more holistic approach to impacts on the OUV of the property carried by each and every component cluster. This is to include impacts on intangible aspects (such as *pungsu* or living heritage values) and environmental pressures (including traffic, noise and pollution).
3. The CHA may wish to submit the draft HIA documents to the World Heritage Centre for review by the Advisory Bodies before finalisation.
4. Opportunities for further negotiation with concerned developers should be pursued to redesign the two sets of commercial structures that will cause great impact on the settings at the Taereung and Seooreung clusters.
5. The CHA should carry out a full review of development impacts at each cluster of the Royal Tombs of the Joseon Dynasty World Heritage property to establish the status of the erosion of OUV since inscription, especially the relationship between the sites and their environment as a key attribute of OUV, and establish a baseline of changes that have occurred to the setting since the time of inscription. As part of this work, the CHA may also establish an exhaustive mapping of key view cones from the property, especially those view cones that support the OUV of the property.
6. New HIA legislation and its implementation should take into full account the [Guidance and Toolkit for Impact Assessments in a World Heritage Context](#) (2022) and be widely disseminated, upon adoption, including through user-friendly materials adapted to the national system. The CHA is also invited to seek any required capacity building in that regard from the World Heritage Centre and the Advisory Bodies.
7. The establishment of Standing Advisory Committees that include community members and representatives of Municipal government should be considered to ensure input from local communities, advance warning of pending issues and concerns, such as proposed large-scale developments, and to promote regular, two-way dialogue.
8. The mitigation options identified in the present report should be pursued.
9. The need for a thorough assessment of the overall state of conservation of the property and the cumulative impacts of development, existing and potential impacts on key view cones from the property, as well as other factors affecting the property's OUV at all 18 component sites should be brought to the attention of the World Heritage Committee, in view of the potential and existing impacts on the OUV identified by the mission at all three visited component sites.

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## Abbreviations

<b>AB(s)</b>	Advisory Body/Bodies
<b>CHA</b>	Cultural Heritage Administration of the Republic of Korea
<b>Convention</b>	<a href="#"><i>Convention Concerning the Protection of the World Cultural and Natural Heritage</i></a> (1972)
<b>HIA</b>	Heritage Impact Assessment
<b>ICCROM</b>	International Centre for the Study of the Preservation and Restoration of Cultural Property
<b>ICOMOS</b>	International Council on Monuments and Sites
<b>ICSC</b>	International Coalition of Sites of Conscience
<b>NGO</b>	Non-governmental organization
<b>OGs</b>	<a href="#"><i>Operational Guidelines for the Implementation of the World Heritage Convention</i></a>
<b>OUV</b>	Outstanding Universal Value
<b>RoK</b>	Republic of Korea
<b>SOC</b>	State of Conservation
<b>SP</b>	State Party
<b>ToR</b>	Terms of Reference
<b>UNESCO</b>	United Nations Educational Scientific and Cultural Organization
<b>WHC</b>	UNESCO World Heritage Centre
<b>WHIPIC</b>	International Centre for the Interpretation of World Heritage Sites



*Seoreung Tombs Cluster*

## 1 Background

The Royal Tombs of the Joseon Dynasty were inscribed on the World Heritage List in 2009 (Decision [33 COM 8B.15](#)) under the following criteria:

- Criterion (iii): Within the context of Confucian cultures, the integrated approach of the Royal Tombs of Joseon to nature and the universe has resulted in a distinctive and significant funeral tradition. Through the application of pungsu principles and the retention of the natural landscape, a memorable type of sacred place has been created for the practice of ancestral rituals.
- Criterion (iv): The Royal Tombs of Joseon are an outstanding example of a type of architectural ensemble and landscape that illustrates a significant stage in the development of burial mounds within the context of Korean and East Asian tombs. The royal tombs, in their response to settings and in their unique (and regularized) configuration of buildings, structures and related elements, manifest and reinforce the centuries old tradition and living practice of ancestral worship through a prescribed series of rituals.
- Criterion (vi): The Royal Tombs of Joseon are directly associated with a living tradition of ancestral worship through the performance of prescribed rites. During the Joseon period, state ancestral rites were held regularly, and except for periods of political turmoil in the last century, they have been conducted on an annual basis by the Royal Family Organization and the worshipping society for each royal tomb.

The brief description for the property notes that it "...forms a collection of 40 tombs at 18 locations. Built over five centuries, from 1408 to 1966, the tombs honoured the memory of ancestors, showed respect for their achievements, asserted royal authority, protected ancestral spirits from evil and provided protection from vandalism. Areas of outstanding natural beauty were chosen for the tombs, which typically have their back protected by a hill as they face south toward water and, ideally, layers of mountain ridges in the distance. Alongside the burial area, the royal tombs feature a ceremonial area and an entrance. In addition to the burial mounds, associated buildings that are an integral part of the tombs include a T-shaped wooden shrine, a shed for stele, a royal kitchen and a guards' house, a red-spiked gate and the tomb keeper's house. The grounds are adorned on the outside with a range of stone objects including figures of people and animals. The Joseon Tombs completes the 5,000 year history of royal tombs architecture in the Korean peninsula."

The full Statement of Outstanding Universal Value can be found in Annex 4.

To date, the World Heritage Committee has not reviewed the state of conservation of the property since its inscription. However, in June 2019, the World Heritage Centre received third-party information regarding the Changneung Public Housing Development project, in the vicinity of the Seooreung Cluster component of the Royal Tombs of the Joseon Dynasty. The WHC transmitted this information to the authorities of the Republic of Korea for verification on 6 June 2019, in the framework of Paragraph 174 of the *Operational Guidelines*, and the State Party responded on 30 December 2019, providing some information about the status of the Changneung project and promising to share details after the project plans become more concrete.

On 4 September 2020, the World Heritage Centre requested clarification from the State Party on the development proposals in the immediate vicinity of the Taereung and Gangneung components. Following further third-party submissions and exchanges with the State Party,

the World Heritage Centre (WHC) transmitted an ICOMOS Technical Review in January 2021 regarding plans to build high-rise apartment buildings near the Changneung, Taereung and Gangneung components of the property, which ICOMOS concluded would have a negative impact on the authenticity, integrity and setting of the property. In this Technical Review, ICOMOS advised the State Party to carry out a Heritage Impact Assessment (HIA) for each individual project.

On 3 November 2021, the World Heritage Centre transmitted further third-party information to the State Party regarding the construction of apartment buildings in the vicinity of the Jangneung component site, carried out without prior permission from the Cultural Heritage Administration of the Republic of Korea (CHA). On 23 November 2021, a delegation from CHA visited UNESCO to provide detailed information regarding the ongoing apartment complex construction in the buffer zones of the Jangneung and other components of the property. The CHA indicated that it was trying to resolve the issue through domestic legal procedures and undertook to submit its response to the World Heritage Centre for review by the Advisory Bodies.

On 25 March 2022, the World Heritage Centre requested the State Party to provide a report on the state of conservation of the property for consideration by the World Heritage Committee at its upcoming extended 45th session (Riyadh, 10–25 September 2023).

In parallel, CHA expressed its interest in inviting an Advisory mission to the property through a letter dated 15 December 2022 to assess the consequences of major developments that may affect three clusters of the property and provide advice on measures to be taken in that regard. Following consultations between the State Party and ICCROM, ICOMOS and WHC, a joint Advisory Mission was organised for 13–17 March 2023 and focused on three component sites of the World Heritage property "Royal Tombs of the Joseon Dynasty": the Jangneung (W6), Seoreung (W1) and Taereung (M3) components.

In particular, the mission focused on the impacts and possible mitigation measures for the following major developments:

- Construction of an apartment complex in the buffer zone of Gimpo Jangneung cluster;
- Public housing and commercial projects proposed near the buffer zone and in the setting of Taereung cluster;
- Public housing and commercial projects proposed near the buffer zone and in the setting of Seoreung cluster.

This report highlights the findings of the mission and provides its conclusions and recommendations based on its Terms of Reference (see Annex 1).



*Advisory Mission Meeting Room, National Palace Museum of Korea*

## 2 Mission Findings

Over its three days, the mission visited three component clusters of the World Heritage property "Royal Tombs of the Joseon Dynasty": Jangneung (Gimpo, W6), Taereung (Goyang, M3) and Seooreung (Seoul, W1).

At each of the component sites, the mission noted the strong presence of urban expansion and associated pressure in the immediate vicinity of the individual component clusters, which also implied that all visited component clusters are today in co-visibility of some elements of urban infrastructure: roads, shops, office buildings, dwellings, military bases, TV antennas, power lines, etc., which all impacted, to varying degrees, the sites' relationship with their very carefully selected surroundings.

The Statement of Outstanding Universal Value for this World Heritage property opens with the following: "The natural surroundings of the Royal Tombs of the Joseon Dynasty, shaped by the principles of *pungsu*, create a delicate setting for the living tradition of ancestral worship and its associated rites" (see the full text in Annex 4). The World Heritage Committee inscribed these sites as a serial property for their "integrated approach ... to nature and the universe" and "the retention of the natural landscape" (Criterion (iii)) that responded to sacred geomantic (*pungsu*) principles which have guided the selection, construction and use of these sites to the present day. As such, the 40 Royal Tombs at the 18 component sites of the property were not inscribed so much for the intrinsic value of each individual building or Tomb site, but for their expression of principles that remain applicable today: "in their response to settings and in their unique (and regularized) configuration of buildings, structures and related elements, [the tombs] manifest and reinforce the centuries old tradition and living practice of ancestral worship through a prescribed series of rituals" (Criterion (iv)).

The living heritage aspects of these sites are especially strong and justified inscription under Criterion (vi): "During the Joseon period, state ancestral rites were held regularly, and except for periods of political turmoil in the last century, they have been conducted on an annual basis by the Royal Family Organization and the worshipping society for each royal tomb". It was also confirmed to the mission that descendants and distant relatives of the entombed continue to use the sites today for ancestral worship and other rites.

As the detailed report on each site visit below will show, the physical conservation of the tomb sites, along with the interpretation facilities visited, is largely excellent, and there is no doubt that the CHA and its partners have cared extremely well for the component clusters sites themselves. However, the challenges of rapid urbanisation, development and great real-estate pressure have led to developments that sit (partly or in full) within the boundaries of the property, many of which having appeared after the inscription of the property. Some very concerning developments, in particular at the Gimpo Jangneung cluster, while located outside of the boundaries and buffer zone of the property, could be considered to represent threats to the component sites' ability to demonstrate the OUV for which they were inscribed, especially as they relate to the relationship between the component and its setting.

### *Factors affecting the property identified in the Third Cycle of Periodic Reporting*

As part of the Periodic Reporting exercise under the World Heritage Convention, of which the third cycle was carried out for the Asia-Pacific region in 2020-2021, the Republic of Korea reported on the factors affecting this property. The questionnaire submitted in September 2021 lists housing as a growing potential negative factor outside of the property's boundaries, which represents an evolution from the second cycle (2012), when this had not been identified as a

factor affecting the property at all. However, the mission confirmed that this factor is by no means potential, but very much a current factor affecting all three visited component clusters. The mission could not, however, confirm the State Party's self-assessment that housing has been a stable trend over time, affecting the property on a restricted spatial scale, and doing so only intermittently and with minor impacts, nor that the management authority shows a high capacity to respond to threats. Similarly, the RoK considered that commercial development (e.g. skyscrapers, large shopping malls and encroachment/changes to skyline) was not a relevant factor for this property, as it had done in the previous cycle (2012). On the other hand, the legal framework was considered a positive, stable factor inside and outside of the property. The mission found that all these factors and others are currently affecting the visited component clusters in a negative way, and it was clearly demonstrated to the mission that this has been a growing trend over the past decade and shows no sign of slowing down.

## 2.1 State of Conservation of the World Heritage Property's Jangneung, Seooreung and Taereung Clusters

### 2.1.1 Jangneung Cluster (Gimpo) (W6)

The Jangneung Cluster has attracted the most attention from civil society, including due to ongoing litigation, in response to the completed construction of a new high-rise development (the Incheon Seo-gu Wondang-dong Geomdan New Town Housing Construction Project) that includes buildings within the buffer zone of this component cluster of the World Heritage property. At the time of the mission, CHA was engaged in legal proceedings against the three private development organisations.

Following a presentation from CHA on the Jangneung Cluster, the mission visited the Tomb site on the afternoon of Tuesday 14 March.

As a first observation, it should be noted that the overall physical conservation of the structures on the site and the state of the landscape elements within this component of the property are excellent. As already stated, the issues arise from the impact of developments located in the buffer zone and wider setting of the property on the component cluster and its capacity to fully represent the Outstanding Universal Value for which the property was inscribed on the World Heritage List.



*Jangneung Tombs Cluster*

*Current and Potential Impacts on the OUV of the World Heritage property*

The Housing Construction Project, approved by the local government administration in 2019, has resulted in the construction of 44 high-rise structures on land immediately within the view line to the south of the property, which has created a substantial impact on the setting of the tomb by obstructing the views to important geomantic points used for the selection of the site and considered essential for the ongoing relationship between the tomb and the surrounding areas.

Of these, 19 structures are directly within the buffer zone (conservation area), in an area zoned 4-1 (the zoning was changed in 2017 to restrict heights to 20 metres).

They sit behind a pre-existing set of high-rise buildings, the Samsung development, which was built in 2002 and which is lower and less intrusive than the new construction, but nonetheless clearly visible, including in a photograph taken around 2014 that was shown to the mission. These buildings were present at the time of inscription and, while they did not support the OUV of the property at the time, their relative size and importance in the skyline meant that they did not hinder the inscription of the property on the World Heritage List.



*View from the Jangneung Tombs*

The 2002 Samsung construction was approved under the Permissible Standards, outlined in the Regulations at that time, although they are located within the buffer zone of the property.

The 19 structures of the Incheon Seo-gu Wondang-dong Geomdan New Town Housing Construction Project located in the buffer zone are the subject of the current litigation on the grounds presented by the developers that the 2017 amendment to the Permissible Standards should not be retrospective to development approvals granted before that date, and that they were unaware of the changed height limits.

Regardless of the outcome of the litigation, it will not be feasible to remove the buildings in the buffer zone that now create a major and negative impact on the OUV of the property, as they obstruct key views that are essential to the relationship between this component cluster of the property and its environment, especially as they relate to the sacred aspects of this living heritage site and the fundamental geomantic principles that have led to the selection of the component cluster, for which they are also inscribed on the World Heritage List.



*View from the Jangneung Tombs*

Of greater consequence, however, is that even if the buffer zone constructions had been prevented, there is no statutory instrument or process in place to prevent the construction of the additional structures of the Housing Development Project outside of the buffer zone in the setting of this component cluster of the property.

Therefore, structures outside the buffer zone would still have created a substantial impact on the setting and view line to the south, as exemplified in the photos in the present report, and any future construction may add to the significant impacts already mentioned.

The buffer zone at the time of inscription was created through a 500-metre boundary that surrounds the component cluster. This reflects the National conservation-area standard for Nationally Designated Cultural Properties and World Heritage properties outside the Seoul boundary (versus a buffer zone of only 100 metres within Seoul).

While the relatively limited size of buffer zone boundary is certainly a factor, statutory and planning guidelines that control development in the component cluster and the surrounding conservation area (buffer zone) do not extend past the buffer zone boundary. Consequently, there is no statutory authority to control impacts on the OUV of the Royal Tombs of the Joseon Dynasty in the wider area around the component clusters, particularly but not restricted to matters relating to their setting.

As a result, significant impacts on OUV have occurred and can continue to occur, including from extensive high-rise developments outside the buffer zone.



*View from immediately behind the Jangneung funerary mounds*

The impact considerations provided – including in the litigation discussions as they were presented to the mission – appear not to give a sufficiently considered assessment of the *pungsu* principles and landscape design, which were identified as primary attributes of the OUV. While there is an understanding of the importance of the view lines from the tomb mounds to the front Ansan mountain, greater consideration of the aesthetic and experiential aspects of how the Royal Tombs were selected, constructed, used in the past, and still used today as spiritual places is required, particularly in the context of the twice-yearly ancestral rites ceremonies. The integrity of the component cluster and therefore of the entire property is significantly enhanced by the perpetuation of traditional ancestral rites and the maintenance of a sacred atmosphere.

The impact of the new developments, largely but by no means exclusively linked to their striking co-visibility to and from the component clusters that make up the property, directly

affects the key attributes of OUV at this component cluster, including *pungsu* and the relationship between the site and its environment, which is a source of great concern. Even more so, the fact that a development with such significant impacts on an internationally recognised and protected site could occur without the knowledge or involvement of CHA, as the primary responsible authority for the protection of World Heritage properties, demonstrates the key importance of expanding the radius and reach of legal protection mechanisms, so that heritage authorities can be part of a conversation about the protection of key attributes of the sites, including its relationship with its wider setting, as early as possible to prevent any such situation from occurring in the future.

### 2.1.2 Seoreung Cluster (Goyang) (W1)

The mission visited the Seoreung Cluster on the afternoon of Tuesday, 14 March. Prof. Shin Heekweon from the University of Seoul gave a presentation on the HIA progress (the University is preparing the HIAs for both the Teareung and Seoreung clusters). After the presentation a visit was undertaken of the Changneung Royal Tomb site. There are five Royal Tomb sites in the Seoreung Cluster.

As with the Jangneung Cluster, it should be noted that the overall physical conservation of the structures on the site and the state of the landscape elements within the property are excellent.



*View from the Seoreung Cluster Tombs, including the street and agricultural buildings*

#### *Current and Potential Impacts on the OUV of the World Heritage property*

The Goyang Changneung New City Project, announced in April 2019, proposes high-rise apartments and commercial structures on land that lies to the west and south of the heritage area, encroaching on the south-west edge of the buffer zone. For this complex of tombs, the buffer zone was defined at the time of inscription as a 500-metre area that surrounds the component cluster.

The Landscape Impact Analysis of each tomb site has identified 10 areas of the construction lying outside the buffer zone where buildings may come into visual range of the component cluster.

Subsequent negotiations with CHA and the developers, based on the impact assessments to date, have resulted in revisions across the identified structures that variously reflect a reconfiguration of building placement and unit combinations, building uses, a decrease in the proposed number of residential units, and decreased heights. The mission was informed that there would be another round of potential revisions once the current HIA work is completed.

This has resulted in a minimised range of heights visible above the skyline from most tombs, all to below 9 metres. However, three of four structures visible from Changneung Tomb will have skyline heights each of 15, 18 or 19 metres.

There is one large commercial development in the New City Project, which will encompass a new train station and the central business zone. The mission was informed that the heights of the commercial buildings planned for construction in the project should not be changed, including due to financial considerations, even though it was shown that this structural node would create a significant visual impact at the Gyeongneung and Myeongneung Tomb sites, reaching 54 metres above the skyline at both tombs.

A photograph of the view line from Hongneung tomb indicates an existing line of high-rise structures in the view line, with a higher cluster evident in the right-hand (north-west) section of the view line. It was advised that these were constructed 20 years ago, i.e. before the World Heritage listing of the Joseon Tombs in 2009. The new constructions would be lower than the current buildings.

Statutory and planning guidelines that control development in the component cluster and the surrounding conservation area (buffer zone) do not extend past the buffer zone boundary. Consequently, there is no statutory authority to control impacts on the OUV of the Royal Tombs of the Joseon Dynasty in the wider area, particularly but not restricted to matters relating to setting. As a result, significant impacts on OUV can continue to occur from extensive high-rise developments outside the buffer zone.

The construction with the small overlap with the buffer zone will have low rise buildings, primary residential, with the aim of reproducing a landscape of traditional residential architecture (*hanok*), which is to have an education and public relations functional overlay, managed by the municipal government.

The original lake and bridge features that would have been in this part of the tomb landscape have been lost, and it is proposed that the approach to the buffer zone development area would seek to recognise these features, although how this is to be done is not decided. This suggests that the developers may consider the bridge and pond placement to be arbitrary and interpretative, which could compromise the authenticity of the landscape of this component cluster. A similar concern lies in the proposed reconstruction of a traditional building village within the buffer zone ("Historical Cultural Experience Village", to be managed by the Goyang municipality).

The area of impact in the buffer zone is currently used for agriculture, and it is possible this has some contribution to the heritage values of the landscape. CHA is in the process of preparing a HIA for the Seooreung Cluster and asserts that the recommendations from the

final HIA document will be considered and could result in further amendments (although apparently not to the commercial project).

The HIA for the Seoreung Cluster is currently only considering view lines, with a more comprehensive impact assessment to follow. While the view line and setting impact is likely to be the greatest threat, a staged investigation compromises a timely and holistic approach and a more considered iteration of responses.

The CHA has reiterated that other impacts will be looked at following the view-line stage of the HIA, further information, and advice from the Advisory mission. The impact considerations as presented do not give a considered assessment of the *pungsu* principles and landscape design, identified as key attributes of the OUV of the property. While there is an understanding of the importance of the view lines from the funerary mounds to the front Ansan mountain, greater consideration of the aesthetic and experiential aspects of how the Royal Tombs were used and constituted as spiritual places is required, particularly in the context of the living heritage aspects and contemporary rites. The integrity of the sites is significantly enhanced by the perpetuation of traditional ancestral rites and the maintenance of a sacred atmosphere, and the OUV clearly indicates the link that exists between this living heritage aspect and the overall setting of the property, its environment, and the important relationships with various sight lines, mountains, and other features on the basis of which the sites were selected and used.

During the visit, it was evident that the impact of the road and village directly in front of the Changneung Tomb already produces considerable visual, traffic, noise, and potential pollution threats. Albeit present at the time of the listing, the road and its accompanying activity and structures create a visual and auditory impact that is negative. It is of concern that the addition of thousands of households in the vicinity of the component cluster will likely lead to a rise in population density following the completion of the development, bringing about a flow-on increase in environmental impacts: increased vehicular traffic, environmental pollution, noise and light pollution, and even increased visitation at the component site. These should be thoroughly taken into consideration in the HIA process.

### 2.1.3 Taereung Cluster (Seoul) (M3)

The mission visited the Taereung Cluster on the morning of Wednesday, 15 March. Dr Kim Young Soo gave a presentation on the HIA progress (Dr Kim is working with Prof. Shin Heekweon from the University of Seoul, preparing the HIAs for both Taereung and Seoreung). After the presentation, a visit was undertaken of the Gangneung Royal Tomb component cluster which includes the site of the Taereung National Sports Training Centre, which is managed by the Korean Sport and Olympic Committee.

#### *Current and Potential Impacts on the OUV of the World Heritage property*

The Seoul Taereung Public Housing Zone Project, proposed in August 2020, envisages the construction of high-rise apartments and commercial structures on land that was the Taereung Golf Course.

Subsequent negotiations with CHA and other stakeholders have resulted in a decrease in the proposed number of residential units (6,800 down from 10,000), which is reflected in decreased heights. The mission was informed that the heights of non-housing, commercial buildings would not be changed.



*Taereung Cluster Tombs*

The proposed development zone, which lies to the east of the Taereung Cluster, encroaches on the edge of its buffer zone. In line with the national Korean conservation-area standard for Nationally Designated Cultural Properties and World Heritage sites within the Seoul boundary, this component benefits only from a 100-metre buffer zone that surrounds it. While the smaller buffer zone boundary for the Seoul area is a factor, statutory and planning guidelines that control development in the Taereung Cluster and its buffer zone do not extend past the buffer zone boundary. Consequently, as with the other component clusters visited by the mission, there is no statutory authority to control impacts on the OUV of the Royal Tombs of the Joseon Dynasty in the wider area, particularly but not restricted to matters relating to setting.

As a result, significant negative impacts on OUV have occurred and can continue to occur from extensive high-rise developments outside the buffer zone.

The CHA is in the process of preparing an HIA for the Taereung Cluster and asserts that the recommendations from the final HIA document will be considered and could result in further amendments (although apparently not to the commercial structures). The plans provided have been prepared by the Ministry of Land, Infrastructure and Transport (MOLIT) and the developer and are yet to be finalised. The mission considers that it is important for impact assessments to consider the entirety of the development projects and their potential negative impacts on the OUV of the property, including commercial buildings. As the use of buildings is of no relevance to their impact on the view lines from the property, the same criteria should apply to housing or commercial structures under consideration and similar height and volume limitations should be applied.

The developers will remove three broadcast towers that create a visual intrusion, which is a welcomed action.



*View from the Taereung Tombs, including two of the broadcast towers considered for demolition*

The development plans indicate the use of the buffer zone encroachment area for green space and the reconstruction of two ponds with historical association with the original landscape of the Royal Tomb sites. One pond apparently already in place is located on the site understood to be the location of an original pond. There is currently no surety as to the original location of the proposed second, more northerly pond. This seems to have been interpreted by the developers as allowing the second pond placement to be arbitrary and interpretative, which could compromise the authenticity of the Royal Tomb landscape.

As with the Seoreung Cluster, the HIA for the Taereung Cluster is only considering view lines, with a more comprehensive impact assessment to follow. While the view line and setting impact is likely to be the greatest threat, a staged investigation similarly compromises a timely and holistic approach and a more considered iteration of responses.

The CHA has reiterated that other impacts will be looked at following the view line stage of the HIA. However, the impact considerations presented to the mission do not give a considered assessment of the *pungsu* principles and landscape design, identified as key attributes of the OUV. While there is an understanding of the importance of the view lines from the funerary mounds to the front Ansan mountain, greater consideration of the aesthetic and experiential aspects of how the Royal Tombs were used and constituted as spiritual places is required, particularly in the context of the twice-yearly ancestral rites. The integrity of the sites is significantly enhanced by the perpetuation of traditional ancestral rites and the maintenance of a sacred atmosphere.

The Visual Impact Assessment as presented indicates a high degree of rigour, encompassing 3D Terrain modelling, photographic records, simulations and evaluating the visibility through the Royal forests. The visual simulations predict that there will be little to no impact in terms of

the height of the new structures (both commercial and residential), as they sit primarily below the tree line.

The exception appears to be the slightly lower screening in the front of Gangneung Nungchim tomb. However, a more disturbing factor is that the new construction would sit lower than, and immediately in front of, an existing line of high-rise structures that already impact the skyline and almost obscure the view to the Ansan mountain. A similar existing set of high-rises is found in the view line from the Taereung Nungchim tomb, but this still allows some view to the Ansan mountain behind. The mission was advised that these developments affecting the sight lines to the *pungsu* geomantic points were constructed between 3 and 5 years ago, after inscription.

There are some more concerning view-line implications that are not related to height, but rather disruption to the landscape character when viewed at a lower level, through the tree line of the Royal Forests. Obviously, this is more impactful lower to the ground (through the trunks) and in winter when there are less leaves on the trees. The CHA has already considered that the Royal Forest depth could be extended in key places through additional plantings, which may require the acquisition of additional land. The mission was informed that a recommendation to this effect has been passed on to MOLIT and the developer, but that the CHA had received no response at the time of the mission.

It is evident that the impact of the road and village directly in front of both the Gangneung Nungchim and Taereung Nungchim tombs already produces considerable visual, traffic, noise, and potential pollution threats. Albeit present at the time of the listing, the road and its accompanying activity and structures create a visual and auditory impact that is damaging, and the expected rise in population density following the completion of planned developments will see a flow-on increase in negative environmental impacts, as explained above.

There are plans to rehabilitate the entrance of this component cluster as part of the development and provide screening from the development along the road opposite the entrance. While this is important and should be undertaken with care, this rehabilitation activity is less likely to have an impact on the OUV than the concerns listed above. Nonetheless, it should be undertaken in the context of broader traffic and streetscape management required as part of the development process.

#### *Taereung National Sports Training Centre*

The State Party, in its nomination dossier for the inscription of the Joseon Tombs on the World Heritage List in 2009, committed to the removal of both the shooting range and National Sports Training Centre (17 facilities), located within the Taereung Component, between the Gangneung Nungchim and Taereung Nungchim tombs. (See page 270 of the nomination dossier. The shooting range has subsequently been removed and a restoration plan put in place). Several facilities in the Training Centre have now been demolished.

In 2020, the Korean Sports and Olympic Committee tabled a document recognising four facilities within the Training Centre (Wolgaegwan, Seungrigwan, Champion House and the Artificial Turf Field) as having cultural heritage values related to their role in the development of Korean sports culture and intends to retain, maintain and reuse the buildings, including as an interpretation site for the Sports Training Centre and the Taereung Cluster.

The four facilities were included in a long-list of eight facilities for possible retention. The decisions were made following research and consultation, including CHA, and the preparation of a HIA of potential impacts on the Taereung Cluster of the Royal Tombs. A management

plan will be prepared for the precinct, including the restoration of the original terrain and landscape.



*Taereung National Sports Training Centre*

The mission was informed that the land is owned by CHA, but the buildings and landscape will be managed by the Korean Sport and Olympic Committee. It is anticipated that some of the buildings could be used for presenting, interpreting and promoting the Taereung Cluster, as well as sports history, which is welcome.

This is seen as a desirable example of conservation of heritage diversity and is expected to generate an attractive place that demonstrates continuity and ancient history. The Training Centre represents a significant part of Korean sports heritage and resonates in the memory of the local community and the broader Korean community, particularly in its association with the 1988 Seoul Olympic games.



*Taereung National Sports Training Centre – Building (partially) scheduled for demolition*

Although commitments were made in 2009 regarding the total removal of the Training Centre, it is evident that the retention of some of the facilities – although they are located within the core heritage area – will not detrimentally impact the OUV of the Royal Tombs of the Joseon Dynasty, and through appropriate interpretation could even serve to enhance it. The mission found in the visit that the sports facilities are not visible from the Gangneung component of the Taereung Cluster. While the second component of the cluster (Taereung) was not visited, the assessment report prepared by the Korean Sports Committee indicates that there is no visual impact from either component of the cluster (Report on the Maintenance of the Facilities of Taereung National Sports Training Centre 2020).

There is a programme of continual removal of the remaining facilities, and some of the structures are planned to be used by winter-sports athletic training until 2027.

## 2.2 Implications of Potential and Ascertained Danger to the OUV of the Property

According to the *Operational Guidelines for the Implementation of the World Heritage Convention*, in the case of a serial national property, “component parts should reflect cultural, social or functional links over time that provide, where relevant, landscape, ecological, evolutionary or habitat connectivity, [and] each component part should contribute to the Outstanding Universal Value of the nominated property as a whole in a substantial, scientific, readily defined and discernible way, and may include, inter alia, intangible attributes” (Paragraph 137). This means that each component part of a serial property contributes and expresses the OUV of the entire property and exists both in relation to one another and to the environment of individual component sites. Consequently, the property does not derive its OUV from a single element or site, but from the collective OUV that is demonstrated by all component sites together. The careful selection of sites that is agreed upon by the State Party, and World Heritage Committee, advised by its Advisory Bodies at the time of inscription becomes, as a World Heritage property, a whole that carries and reflects the OUV at each component site. In turn, any threat posed to one element of the series is posed to the property as a whole, and therefore to the OUV of the entire property.

In this spirit, it is of particular concern that the mission found similar factors affecting all three visited component clusters, albeit with varying degrees of gravity, urgency and impact on the key attributes of OUV.

Despite the CHA's excellent management of the inscribed component sites within their boundaries, its capacity to adequately protect the clusters from significant impacts that often arise several kilometres away from these clusters is clearly limited by the scope of its legal and management purview. This complex issue should be addressed as much and as quickly as possible, including through proactive dialogue with stakeholders and mandatory impact assessments. Indeed, based on the limited selection of visited sites, the mission is concerned about the potential risk that such issues could gradually erode key attributes of OUV, especially if they occur across a number of component clusters and negatively impact the *pungsu* principles that are the core of the OUV to such a degree that the property as a whole may eventually no longer be able to express fully its OUV.

While the mission considers that none of the factors currently affecting individual component sites would, in and of themselves, be of sufficient gravity to jeopardise the World Heritage status of the property, it is the cumulative nature of these threats across all visited component sites, and quite possibly at others, that represents the greatest concern for the mission.

In accordance with Paragraphs 178-179 of the *Operational Guidelines*, the World Heritage Committee can consider a cultural World Heritage property to be in danger, and therefore inscribe it on the List of World Heritage in Danger, if it faces ascertained or potential danger. Ascertained danger implies that the property is faced with specific and proven imminent danger, such as "serious deterioration of architectural or town-planning coherence; ... serious deterioration of urban or rural space, or the natural environment; ... significant loss of historical authenticity". Potential danger, on the other hand, implies that the property is faced with threats which could have deleterious effects on its inherent characteristics, such as "modification of juridical status of the property diminishing the degree of its protection" or "threatening effects of town planning" (Paragraph 179). While it was not the purview of this mission to make such a determination in the case of the Royal Tombs of the Joseon Dynasty, it is concerning that, based on the component sites visited, the property would likely qualify for consideration under some of those criteria.

Furthermore, the fact that the Jangneung apartments were reportedly sold to prospective buyers as 'Royal Tombs view apartments' demonstrates the developers' awareness of the value of heritage, including as a value-adding element for their real estate investment, but contrasts sharply with the fact that the CHA was not involved or consulted at any relevant step of the process. The consequences of a gap in the system whereby the authority responsible for heritage was not required to be involved in key decision-making processes that directly affect this heritage are unfortunate, especially considering the provisions of key texts which the Republic of Korea, as a signatory of the World Heritage Convention, has committed to following. As outlined in Paragraph 172 of the *Operational Guidelines*, it is the responsibility of the State Party to inform the Committee, through the World Heritage Centre, "of their intention to undertake or to authorize in an area protected under the Convention major restorations or new constructions which may affect the Outstanding Universal Value of the property. Notice should be given as soon as possible (for instance, before drafting basic documents for specific projects) and before making any decisions that would be difficult to reverse, so that the Committee may assist in seeking appropriate solutions to ensure that the Outstanding Universal Value of the property is fully preserved." To satisfy these provisions, the management authorities must be involved in regular coordination mechanisms that allow project proponents in the vicinity of the property to proactively seek the CHA's opinion and approval for projects that may affect the OUV of World Heritage properties long before ground

is broken for any project, and engage in constructive dialogue about possible mitigation measures.

Similarly, Paragraph 118bis of the *Operational Guidelines* states that "States Parties shall ensure that Environmental Impact Assessments, Heritage Impact Assessments, and/or Strategic Environmental Assessments be carried out as a pre-requisite for development projects and activities that are planned for implementation within or around a World Heritage property. These assessments should serve to identify development alternatives, as well as both potential positive and negative impacts on the Outstanding Universal Value of the property and to recommend mitigation measures against degradation or other negative impacts on the cultural or natural heritage within the property or its wider setting." In this spirit, it is essential that major development and other projects in the vicinity of the property, even in the wider setting, be subject to such requirements, even if the geographic location of the project is not within or immediately outside of the buffer zone of the component sites, but may nonetheless have an impact on any component site of a property.

To make these requirements clear and as binding as the legal system will permit, the mission considers that straightforward, practically oriented and proactive communication about the implications of an inscription under the World Heritage Convention is essential and should be widely disseminated.

## 2.3 Possible Mitigation Measures

In view of the similar factors that affect the visited component sites of the property, albeit with variable degrees of gravity, the mission's reflections concerning any possible mitigation measures are outlined below.

### 2.3.1 Jangneung Cluster (Gimpo) (W6)

The impacts on the Jangneung Cluster cannot be easily mitigated without the removal of the new development, which would be politically, economically and socially unfeasible. The apartments have been occupied, and large numbers of residents would be displaced as a result of even a partial height reduction of the extensive development. Therefore, earlier proposals by the CHA to reduce the floor levels of the individual structures would be unpracticable at this point in time.

The outcomes of the litigation could provide an opportunity to create a nationally focussed discussion of the importance of national heritage and of World Heritage status, including obligations under the World Heritage Convention (notably Articles 4 and 5). This could assist with protecting the OUV as reflected at other component clusters that form the property, and with the progression of proposals to reinforce the current *Special Act on Preservation, Management and Use of World Heritage* to allow the introduction of sections enforcing the use of Heritage Impact Assessments and incorporating a broader engagement with and understanding of the importance of settings in World Heritage properties. This could encompass a cluster-specific assessment and identification of view cones to determine potential impacts to setting, which would complement the current establishment of buffer zones by a measured distance from the cluster.

### 2.3.2 Seooreung Cluster (Goyang) (W1)

The HIA for the Seooreung Cluster should be completed as a matter of priority, including all aspects of potential impacts for the component site and the property's OUV that it must carry,

employing an iterative process. This assessment should follow the [Guidance and Toolkit for Impact Assessments in a World Heritage Context](#) (2022), which provides a number of tools to identify and address which aspects of a project might affect a component site and its OUV using a holistic approach. A properly conducted impact assessment can help identify better options for a project that yield more benefits in the long term, satisfying both conservation and development needs.

The setting of the property outside of the buffer zone needs to be a priority factor for consideration. The assessment should address the identified focus of the cumulative impact of previous development projects in the vicinity, considering the developments that already intrude on the view line from the Hongneung tomb, and that impact aspects of OUV.

The possibility of reconsidering the impact of the height and clustering of the commercial zone buildings should be considered: while economic matters can be of importance, in this instance the buildings may be contributing to the impacts on the OUV, which the HIA had not directly addressed at the time of the mission's visit. Most importantly, the recommendations of the HIA must be considered and acted on by the developer.

Further assessment is required of both tangible and intangible aspects of the OUV that could be at risk. This should include potential impacts on the integrated approach to nature and the universe that created a unique and important funeral tradition associated with the royal tombs. By adopting the principles of *pungsu* and maintaining the natural environment, a distinctive sacred place was created for the practice of ancestral rituals and continues to be highly significant today. It should also include an understanding that the view lines from the level of the funerary mounds to the Ansan mountain are no less important because they are not seen by most visitors. The exclusivity of the view from the tomb itself is an integral part of the Royal Tomb's sacred landscape and reflection of *pungsu* principles.

The possible interpretation of the missing bridge and pond, currently proposed for the buffer zone development area, should be pursued through archival and archaeological investigation to determine where the original pond and bridge were located, whether or not it was in the buffer zone. Once this has been determined, an appropriate interpretation should be provided.

The HIA should also be directed to the proposed development within the buffer zone area. While the intent and character of the *hanok* village may not impact the view line, there are much wider implications for impacts on OUV. The recreation of a landscape that does not respect the authenticity of the Royal Tombs needs to be more fully considered. The proposals for the landscape in the buffer zone, which is linked to the Royal Tomb site, should potentially be redesigned to reflect this linkage and the contribution of that area to the original setting of the tombs in this component.

### 2.3.3 Taereung Cluster (Seoul) (M3)

The HIA for Taereung Cluster should also be completed as a matter of priority, including all aspects of potential impact on OUV and addressing all three inscription criteria.

The setting outside the buffer zone needs to be a priority factor for consideration, and the HIA should address the identified focus of the cumulative impacts of previous development projects in the vicinity, considering the more recent developments that already intrude on the view line from both tombs, and can be considered to have an impact on aspects of the OUV.

The possibility of reconsidering the impact of the height and clustering of the commercial buildings should be considered: in this case as well, decisions based exclusively on economic

priorities may be contributing to the impacts on the OUV. Similarly to the Seooreung Cluster, the HIA had not directly addressed this at the time of the mission's visit, and any recommendations emanating from the HIA must be taken into full consideration and acted upon by the developer.

The same points raised about the Seooreung Cluster apply here: further assessments of tangible and intangible aspects of the OUV that could be at risk are needed, including potential impacts on the integrated approach to nature and the universe, the prime importance of the principles of *pungsu* for the OUV property and each of its component cluster, and the need to make clear to all stakeholders that the view lines from the funerary mounds to the Ansan mountain are no less important because they are not seen by most visitors.

The reconstruction of the second pond, currently proposed for the green area within the buffer zone, should be pursued through archival and archaeological investigation to determine where the original (second) pond was located, whether or not it was in the buffer zone. Once determined, an appropriate interpretation should be provided.

The proposals for the landscape in the buffer zone, which is linked to the Royal Tomb site through the water connection, should be redesigned to reflect this linkage and the contribution of that area to the original tomb setting.

The option of extending the Royal Forest depth should be discussed further with the developer and MOLIT. Any supplementary planting, or the potential need to acquire additional land, should be investigated with rigour to ensure that neither historical landscape prescriptions for the Royal Tombs nor other ownership rights are compromised or introduce additional impacts, bearing in mind that tree planting at the Royal Tombs is controlled under the Cultural Heritage Protection Act. The additional option should be pursued of assessing a variation in the density and positioning of the buildings to reduce the solid bulk visible through the trees.

#### *Taereung National Sports Training Centre*

The retention of some facilities to recognise the national-level heritage importance of the National Sports Training centre should be supported. This should be pursued through an appropriate heritage listing, ensuring that the implications create no impact on the OUV of the Royal Tomb Site yet provide the appropriate protection for the remnant sports centre precinct.

The potential to use the structures for interpretation of both the Royal Tombs and sports heritage, and future uses and management, should be outlined in a management plan for the precinct and provided to the World Heritage Centre for review by the Advisory Bodies.

## 2.4 Strengthening of the National Protection and Management Systems for the World Heritage Property

### 2.4.1 Revision of the World Heritage Legislation

The mission was informed that an amendment has been proposed to alter the Special Act on World Heritage to include a statutory imperative for a HIA system. The amendment is currently pending with the Legal Affairs Committee, and it is anticipated that it should be passed in the summer of 2023. The stated objective of this amendment is to ensure an effective protection and management of World Heritage properties by mitigating negative impacts through identifying, predication and assessing potential impacts of development at their early stages of planning.

For this amendment to effectively protect the OUV of World Heritage properties, the following outcomes should be achieved, either in the statute or legislated regulations:

- There should be a clear understanding of when an HIA should be prepared and how the HIA preparation is triggered. The concept of the wider setting must be incorporated with an understanding that impacts to OUV can occur outside the specified boundaries of the World Heritage property, its component sites and any buffer zones, or their equivalents in the national legislation.
- Consultations and communication should occur between CHA and the concerned local governments and other national government agencies to give them a better understanding of the concepts of both buffer zones and wider settings. This should help as new development projects are proposed.
- The status of the HIA recommendations should be such that their implementation is statutorily binding for a proposal to move forward.
- While mitigation recommendations are important, the HIA recommendations should also allow for the option of the action/development not proceeding in any form.

If at all possible, it should be ensured that the legislation takes into account the principles, methods and approaches to impact assessments and protection for World Heritage outlined in the [Guidance and Toolkit for Impact Assessments in a World Heritage Context](#) (2022), in an effort to avoid further revisions of the legislation in short succession. As expressed during the mission, the World Heritage Centre and the Advisory Bodies stand ready to provide further guidance to the State Party in that regard, along with any required capacity building for HIAs.

#### 2.4.2 HIA System and Operations

As the potential impacts will differ for all 40 Royal Tombs, and for each of the 18 clusters, further work is essential to identify the specific issues and challenges for the individual settings of each tomb cluster, and how each wider setting is constituted. Lists of attributes and how they reflect specific values should be prepared. Assessments should be made of specific zones of potential impact through establishing view cones, and the wider setting of each cluster identified as part of any HIA scoping process. It is noted that the World Heritage Act encompasses all 15 of the Republic of Korea's World Heritage properties; this work should therefore also extend to the other 14 inscribed properties, including properties with natural heritage values, and should be undertaken proactively for nomination projects under preparation.

As a matter of priority, the CHA should ensure that all appropriate documentation and internal and public communications are in place by the time the amendment is approved. This will be particularly important for engagement with other national agencies (such as MOLIT), municipal governments and industry representatives. Particularly, the HIA system should establish that it is the proponent who engages an HIA specialist for their project and meets the cost of that expert opinion.

HIA processes should allow for consultation between all parties, both at an early stage and as required. The outcomes must be objective and transparent. Furthermore, as an HIA should be iterative, the process must include assessment of all potential impacts on OUV in a holistic approach.

In partnership with relevant internal organisations (for example, nominated universities and/or ICOMOS Korea) the CHA can play an essential role in progressing education and professional development around HIAs. This can be supported through each of the UNESCO World Heritage Centre, ICCROM and ICOMOS (noting that the involvement of IUCN is also important for World Heritage properties with natural values).

Standing Advisory Committees that include community members and representatives of Municipal government should be considered. This assists with local input and advance warning of pending issues and concerns, such as proposed large-scale developments. Mechanisms that are regular and promote two-way dialogue are important.

Finally, as the legislation of HIAs comes into force, a Korean-language translation of the 2022 *Guidance and Toolkit for Impact Assessments in a World Heritage Context* should be ready for dissemination, along with user-friendly summaries of its key messages.



*Panoramic view from the Jangneung Tombs*

## 3 Conclusions and Recommendations

### 3.1 Conclusions

The CHA is endeavouring to achieve stronger protection for the World Heritage property "Royal Tombs of the Joseon Dynasty" and its component clusters within a political, economic and social environment that seeks to alleviate demand for residential and commercial expansion within Seoul and its immediate surrounds.

The Royal Tombs component clusters present as undeveloped and 'green' areas in these locations, and hence as attractive options for alternative use. Unfortunately, the current statutory protections and guidelines for development around the component clusters do not extend outside their buffer zones.

Although development had already occurred around some clusters at the time of listing (2009) and was identified as a continuing threat, there has been no mechanism to control additional construction outside of the buffer zone, and this is evident at the three component clusters visited. The mission found significant housing and commercial development projects, whether recently completed or in the planning stages, to represent substantial threats to the overall OUV of the property, which was inscribed for the relationship between the tombs and their environment, based on geomantic *pungsu* principles according to which the sites were selected and constructed (and eventually inscribed on the World Heritage List). The mission also found that, since the very intrusive new developments, particularly at the Jangneung Cluster, affect these *pungsu* principles, they also affect the living heritage aspects at the sites, which have been in near-continuous use since their creation, with rituals and ceremonies being regularly held to this day. It is a concern of the mission that similar situations with recent, ongoing or planned developments located on the outer limits of the property's buffer zones or in the wider setting of the component sites are likely to be found at some (or even many) of the other 15 tomb clusters.

The mission shares the concerns expressed by the CHA regarding the impacts of ongoing litigation on the protection of the property, and the precedents that could be set for other World Heritage properties in the Republic of Korea, and largely supports the arguments presented by CHA in its summary of past and ongoing legal cases involving new developments.

The mission therefore welcomes the fact that the current circumstances appear to have led to a more active public response due to the size of the developments and direct encroachment on buffer zone areas.

Relevant legal instruments, policies and procedures, and stakeholder discussions for the management of World Heritage properties and their OUV require a greater consideration of:

- how and when to undertake Heritage Impact Assessments;
- the implications of the wider setting of component sites and its potential impacts on the overall OUV of the property;
- a broader consideration of the attributes that make up the OUV of a property and how they can be impacted.

The results of current litigation in relation to the developments at the Jangneung Cluster, the progress of the amendment to the World Heritage legislation, and negotiations regarding the assessed developments will be assisted by advice from this Advisory Mission and ongoing support from the World Heritage Centre, ICOMOS and ICCROM.

Finally, the mission notes that the World Heritage Committee is set to review the state of conservation of the property at its extended 45th session (Riyadh, 10–25 September 2023), and that the Committee may consider the outcomes of this mission report in its deliberations. It should however be emphasized that the mission only visited three of the component clusters of the property, all of which showed some degree of impacts from urban expansion and development; however, the mission's purpose was not to review the state of conservation of the entire property, but the mission considers that this would represent an essential next step to determine how many clusters are affected by similar issues, in view of its findings.

### 3.2 Recommendations

In view of the above, the mission recommends the following:

1. The CHA should reinforce its communication with relevant government entities concerning the obligations incumbent on the Republic of Korea as a signatory to the World Heritage Convention, and notably Articles 4 and 5 of the *Convention*, as well as Paragraphs 118bis and 172 of the *Operational Guidelines*.
2. Ongoing Heritage Impact Assessments for several component sites should be carried forward as a priority and expanded from the current focus on view lines to consider a more holistic approach to impacts on the OUV of the property carried by each and every component cluster. This is to include impacts on intangible aspects (such as *pungsu* or living heritage values) and environmental pressures (including traffic, noise and pollution).
3. The CHA may wish to submit the draft HIA documents to the World Heritage Centre for review by the Advisory Bodies before finalisation.
4. Opportunities for further negotiation with the relevant developers should be pursued to redesign the two sets of commercial structures that will cause great impact on the settings at the Taereung and Seooreung clusters.
5. The CHA should carry out a full review of development impacts at each cluster of the Royal Tombs of the Joseon Dynasty World Heritage property to establish the status of the erosion of OUV since inscription, especially the relationship between the sites and their environment as a key attribute of OUV, and establish a baseline of changes that have occurred to the setting since the time of inscription. As part of this work, the CHA may also establish an exhaustive mapping of key view cones from the property, especially those view cones that support the OUV of the property.
6. New HIA legislation and its implementation should take into full account the [Guidance and Toolkit for Impact Assessments in a World Heritage Context](#) (2022) and be widely disseminated, upon adoption, including through user-friendly materials adapted to the national system. The CHA is also invited to seek any required capacity building in that regard from the World Heritage Centre and the Advisory Bodies.
7. The establishment of Standing Advisory Committees that include community members and representatives of Municipal government should be considered to ensure input from local communities, advance warning of pending issues and concerns, such as proposed large-scale developments, and to promote regular, two-way dialogue.
8. The mitigation options identified in the report above should be pursued.
9. The need for a thorough assessment of the overall state of conservation of the property, the cumulative impacts of development, existing and potential impacts on key view cones from the property, as well as other factors affecting the property's OUV at all 18 component

sites should be brought to the attention of the World Heritage Committee, in view of the potential and existing impacts on the OUV identified by the mission at all three visited component sites.

## 4 Annexes

- **Annex 1:** Terms of Reference of the Mission
- **Annex 2:** Mission Team
- **Annex 3:** Mission Programme
- **Annex 4:** Statement of Outstanding Universal Value

## Annex 1: Terms of Reference of the Mission

### TERMS OF REFERENCE

#### **Joint World Heritage Centre/ICOMOS/ICCROM Advisory Mission to the Royal Tombs of Joseon Dynasty (Republic of Korea)**

**13–17 March 2023**

The State Party of the Republic of Korea has submitted to UNESCO a report of the state of conservation of three clusters of the World Heritage property "Royal Tombs of the Joseon Dynasty": Jangneung (W6), Taereung (M3) and Seoreung (W1).

The compatibility between World Heritage conservation and urban development will likely become the focus of future discussions on the conservation of the World Heritage property and the relevant laws and regulations. The State Party of Korea will make its utmost effort by, for example, closely cooperating with UNESCO. And as part of its effort, Korea invites an advisory mission to assess the consequences of, and advise on measures to be taken with regards major developments that may affect three clusters of the property.

The major developments are:

- Construction of an apartment complex in the buffer zone of Gimpo Jangneung cluster;
- Public housing projects proposed near the buffer zone and in the setting of Taereung cluster;
- Public housing projects proposed near the buffer zone and in the setting of Seoreung cluster.

The Advisory Mission shall:

- Review the overall state of conservation of the Gimpo Jangneung, Seoul Taereung and Goyang Seoreung clusters of the Royal Tombs of the Joseon Dynasty World Heritage property;
- Assess developments in the buffer zones and setting of these three components for any current or potential impacts on the Outstanding Universal Value (OUV) on the World Heritage property on the basis of site visits and documentation provided;
- Suggest feasible measures to mitigate potential or ascertained impacts on the OUV of the World Heritage property for developments in the buffer zones and setting of these three components ;
- Based on the evaluation of developments in the buffer zones and setting of these three components, provide recommendations on steps to strengthen the national protection and management system to better safeguard the OUV of this World Heritage property, especially in relation to the management of buffer zones and the property's wider setting and good practices for collaboration between national authorities at different levels for the conservation and management of World Heritage.

To achieve these objectives, the Advisory Mission shall review all necessary technical documents, undertake site visits and participate in technical, on-site meetings with the authorities to assess the possible impacts of developments. The mission may also meet with experts in heritage management, urban planning and legal frameworks from the relevant national authorities.

Based on site visits and meetings with representatives of the State Party, the Advisory Mission shall prepare a report, including an analysis of the abovementioned points and recommendations for the State Party.

The mission team shall deliver this report within one month after the conclusion of the Advisory Mission.

The State Party will facilitate necessary consultations with personnel, agencies and key stakeholders at the local, regional and national levels and will arrange site visits and local transportation.

The State Party shall provide the mission team with all required documentation and information necessary for the successful effectuation of their tasks prior to the mission. Should necessary additional information be as identified during the mission, the State Party shall provide it within ten days after completion of the mission at the latest.

In line with policies of ICCROM, ICOMOS and UNESCO, the mission team will not engage with the media, nor publicly discuss the mission's findings and recommendations, which shall only be presented in the final mission report.

## Annex 2: Mission Team

The mission team was composed of:

- **Jane Harrington**, representing ICOMOS International;
- **Joseph King**, representing ICCROM;
- **Anatole Oudaille-Diethardt**, representing the UNESCO World Heritage Centre.

## Annex 3: Mission Programme

### MISSION SCHEDULE

#### Joint World Heritage Centre/ICOMOS/ICCROM Advisory Mission to the Royal Tombs of Joseon Dynasty (Republic of Korea)

13-17 March 2023

□ Proposed Itinerary (all in Seoul time)

Date	Time	Content	Venue
<b>Day 1</b>	<b>by 17:30</b>	<b>Arrival at Incheon Int'l Airport</b>	Hobart/Paris/Rome to Incheon
	<b>18:00 ~ 19:00</b>	<b>Transport to Hotel</b>	Incheon to Seoul
<b>Day 2</b>	<b>09:00 ~ 12:00</b>	<b>Brief on state of</b> Royal Tombs of Joseon Dynasty	Seoul
	<b>12:00 ~ 13:00</b>	Lunch	Seoul
	<b>13:00 ~ 14:00</b>	<b>Transport to</b> Jangneung, <b>Gimpo</b>	Seoul to Gimpo
	<b>14:00 ~ 15:30</b>	<b>Visit to</b> Jangneung, <b>Gimpo</b>	Gimpo
	<b>15:30 ~ 16:30</b>	Transport to Seoreung, Goyang	Gimpo to Goyang
	<b>16:30 ~ 18:00</b>	<b>Visit to</b> Seoreung, Goyang	Goyang
	<b>18:00 ~ 19:00</b>	Dinner	Goyang
	<b>19:00 ~ 20:00</b>	Trip back to Seoul and Lodging	Goyang to Seoul

<b>Day 3</b>	<b>09:00 ~ 10:00</b>	Transport to Taereung, Seoul	Seoul
	<b>10:00 ~ 12:00</b>	Visit to Taereung, Seoul	
	<b>12:00 ~ 13:00</b>	Lunch	
	<b>13:00 ~ 14:30</b>	Visit of the <b>Taereung sports grounds</b> , Seoul	
	<b>14:30 ~ 15:30</b>	Transport to <b>National Palace Museum</b>	
	<b>16:00 ~ 18:30</b>	Meeting with Korean Heritage Experts	
	<b>18:30 ~ 20:00</b>	Dinner and Lodging	
<b>Day 4</b>	<b>09:00 ~ 12:00</b>	Visits to <b>Changdeokgung Palace &amp; Jongmyo Shrine</b>	Seoul
	<b>12:00 ~ 14:00</b>	Lunch	
	<b>13:00 ~ 17:00</b>	Advisory Mission closing meeting	
<b>Day 5</b>	<b>from 08:00</b>	<b>Transport to Incheon Int'l Airport</b>	Seoul to Incheon
	<b>12:15 / 18:30</b>	Departure from <b>Incheon Int'l Airport</b>	Incheon to Hobart/Paris/Rome

## Annex 4: Statement of Outstanding Universal Value

### Brief Synthesis

The natural surroundings of the Royal Tombs of the Joseon Dynasty, shaped by the principles of pungsu, create a delicate setting for the living tradition of ancestral worship and its associated rites. The royal tombs, with their hierarchical ordering of areas from the profane to the sacred, and their distinctive structures and objects, are an ensemble that resonates with the historic past of the Joseon Dynasty.

**Criterion (iii):** Within the context of Confucian cultures, the integrated approach of the Royal Tombs of Joseon to nature and the universe has resulted in a distinctive and significant funeral tradition. Through the application of pungsu principles and the retention of the natural landscape, a memorable type of sacred place has been created for the practice of ancestral rituals.

**Criterion (iv):** The Royal Tombs of Joseon are an outstanding example of a type of architectural ensemble and landscape that illustrates a significant stage in the development of burial mounds within the context of Korean and East Asian tombs. The royal tombs, in their response to settings and in their unique (and regularized) configuration of buildings, structures and related elements, manifest and reinforce the centuries old tradition and living practice of ancestral worship through a prescribed series of rituals.

**Criterion (vi):** The Royal Tombs of Joseon are directly associated with a living tradition of ancestral worship through the performance of prescribed rites. During the Joseon period, state ancestral rites were held regularly, and except for periods of political turmoil in the last century, they have been conducted on an annual basis by the Royal Family Organization and the worshipping society for each royal tomb.

### Integrity and Authenticity

As a serial nomination, the sites convey a complete understanding of the setting, layout and composition of the Joseon royal tombs. As individual sites, there are minor exceptions represented by part of sites included in the buffer zone. Urban development has affected the sight lines of some of the sites (Seolleung, Heolleung and Uireung), but it appears that urban construction is visible only near the top of certain tombs. Strict legislation now ensures that development within the buffer zones is controlled. Over time, elements of the sites have been repaired, restored and reconstructed. The burial areas have seen the least intervention, while the ceremonial and entrance areas have seen the most, and largely because the use of wood as a building material. The original function has been continued at all sites and a sacred atmosphere has been largely maintained, especially at the less urban sites. Regarding form and design, only a few entrances have been changed; overall, the Royal Tombs of Joseon have marked authenticity.

### Management and protection requirements

Extensive legal protection, including traditional protection, exists, and an integrated management system is able to ensure consistency from property to property, including implementing and maintaining efficient measures in conservation initiatives and on-going property maintenance.