Edinburgh World Heritage Site Management Plan Consultation Response

Planning Committee
25 November 2004

1 Purpose of report

1.1 To seek Committee's approval for the enclosed comments to be passed to the Edinburgh World Heritage Trust as the views of the City Council on the draft Edinburgh World Heritage Site Management Plan.

2 Summary

2.1 The internal consultation with Council departments has identified a number of relevant and helpful comments. For the most part, it is anticipated that they can be accommodated into the final report. In one or two instances, some discussion with the relevant department will be required.

2.2 A number of general comments are also made that will help to clarify the status of the document.

3 Main Report

Background

3.1 The Edinburgh World Heritage Site was inscribed in 1995. The World Heritage Committee stated that the World Heritage Site (WHS) of the Old and New Towns "represents a remarkable blend of the two urban phenomena: the organic medieval growth and eighteenth and nineteenth century town planning".

3.2 The WHS meets the following UNESCO criteria measuring "outstanding universal values":

It exhibits an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town planning or landscape design.
It represents an outstanding example of a type of building or architectural or technological ensemble or landscape which illustrates significant stages in human history.

Further, the WHS was held to meet the test of authenticity in design, material, workmanship or setting and have adequate legal and/or traditional protection and management mechanisms to ensure the conservation of the nominated cultural properties.

The Management Plan

3.3 State parties to the UNESCO convention are required to prepare Management Plans for the management of each cultural and natural property within their control. The requirement is reflected in the Operational Requirements Concerning Protection and Management Mechanisms for Cultural Properties (UNESCO March 1999). In addition, it is the policy of Scottish Ministers that a combination of clear policy framework and a comprehensive management plan should be established to assist in maintaining and enhancing the quality of World Heritage Sites (NPPG 18).

3.4 The purpose of the Edinburgh World Heritage Site Management Plan is to provide a framework for the preservation and enhancement of its cultural heritage. At its core, the document sets out the Outstanding Universal Values (OUVs) of the WHS and then identifies the risks to those values and the measures required to mitigate the risks. There is also a description of the Site, an overview of the policy context and a chapter covering promotion and appreciation of the Site.

3.5 Central to the document are the Outstanding Universal Values set out in Chapter 4 and the Risks and Policies and Proposals set out in the following Chapter. It is on these issues that consultation will focus. In summary, the Outstanding Universal Values are:

Landscape

- Setting and Views
- Juxtaposition of the Old and New Towns
- Valley of the Water of Leith

Urban Form and Architecture

- Contrasting Characters
- The Outstanding Townscape
- Outstanding Buildings
- Interiors
- Statutes and Monuments
- Parks, Gardens and Graveyards
History and Heritage

- Historic City and Ancient Capital of Scotland
- Communities
- Association with people of world recognition
- Edinburgh - Festival City

Consultations

3.6 On 5 August 2004, Committee approved a draft version of the Edinburgh World Heritage Site Management Plan, produced by the Edinburgh World Heritage Trust, for consultation. It was agreed that Planning and Strategy would co-ordinate comments from CEC departments and refer them back to Committee prior to them being passed on to EWHT. Appendix 1 of this report contains a summary of the comments received. The original comments will also be passed to EWHT for their assessment. Appendix 1 also contains a brief assessment of the comments received and Committee will be asked to endorse this assessment.

3.7 In the meantime, EWHT have carried out a consultation exercise. This has included leafleting all houses within the World Heritage Site, holding three open meetings in their offices, and mounting an exhibition that has been located in different venues within the World Heritage Site including the reception area of 1 Cockburn Street, Stockbridge library and the Central library. The next stage is for EWHT to assimilate all the comments from their consultation exercise, including those contained herein, and report back to the Executive of the Council. This is programmed to take place early in 2005.

3.8 In order to bring together the Council's response, a copy of the draft Management Plan was sent to each department director asking for comments. It was anticipated that for some departments, there would be no comment, but for others, it would be a matter of some interest. Within the responses there were few general comments, but those that were made supported and welcomed the production of the Management Plan. For the most part the comments were matters of detail or fact, picking up on areas of interest specific to the functions of that particular department. These have been collated and tabulated in Appendix 1.

3.9 It is recognised that there is likely to be considerable interest in the Action Plan that will flow from the Management Plan. The Action Plan will be the subject of further consultation, especially with those partners who will have responsibility for delivering some of the actions.
3.10 Planning welcomes the Management Plan and considers it a positive document that will add to the guidance associated with the World Heritage Site. It is also a key production for the Edinburgh World Heritage Trust and helps to clarify their new role. Some general comments are listed below that, if carried forward, will help in making clear the role of the Management Plan.

Planning Related Comments

3.11 The process set out in the Management Plan is supported. It is considered helpful and logical to identify those elements of significance that make up the Outstanding Universal Value of the Site and then to identify the risks that the OUVs might face. Policies and Proposals that mitigate the risks are then set out. It is important that agreement is reached over the OUVs as much of the following actions flow from them. An Action Plan, with specific actions attributed to particular partners, will follow in order to ensure that the challenges to the Site are met. It is evident however, from the comments received and from comments made at the public meetings, that the role of the Action Plan is not set out clearly. It is therefore recommended that the relationship of the Action plan to the Management Plan be clearly set out.

3.12 It is important that the Management Plan relates to other documents that cover the City Centre and does not solely focus alone on a narrow range of conservation policies. For example, the Plan must be clearly linked to the Site, and it must recognise the balance between the Council's strong conservation and heritage policies and those policies to maintain the City Centre as a viable economic entity, including the regionally important City Centre shopping area. Also, of particular significance are the forthcoming City Local Plan and the existing Action Plan of the City Centre Management Company. The WHS Management Plan should contain Policies and Proposals that sit comfortably with those documents. The Management Plan's main aim: "to promote the sustainable management of the World Heritage Site as a viable living and working city" does reflect the special circumstances of a capital city that is also a World Heritage Site.

3.13 The general thrust of the Management Plan is therefore supported. It recognises that the Site must evolve and respond to the challenges of a capital city centre, and that the Management Plan must take cognisance of the other relevant Council plans and initiatives that operate within the city centre. Perhaps the most significant relationship will be with the emerging City Local Plan. It is not explicit as to how the two documents will inter-relate. It is recommended that the relationship between the Management Plan and the City Local Plan is clearly explained.
3.14 While the use of Policies and Proposals is considered a useful mechanism for linking the subsequent Action Plan with the Risks, it may be helpful to separate out the policies and see if they stand alone as a coherent set of policies for the World Heritage Site. Once that is done, it is important that there is no conflict with the policy content of the emerging City Local Plan. *It is recommended that the policies are separated out and that they form a coherent set of policies for the World Heritage Site, in line with the policies of the Council’s existing and emerging Local Plans.*

3.15 The Management Plan should provide the reader with an understanding of the key issues that will impact on the Site in the near future. While the Action Plan will list a range of action that will safeguard the Outstanding Universal Value of the site, it is clear that there are a limited number of significant issues that will impact on the Site over the next few years. *It is recommended that the Management Plan identifies key issues that will affect the Site in the next few years and that these are set as priorities for action within the Action Plan.*

3.16 While the Management Plan is comprehensive in its coverage of the built heritage above ground, it says very little about archaeology. This requires to be remedied. It is understood that the City Archaeologist has spoken directly to EWHT on this matter. *It is recommended that the Management Plan elaborates on its limited coverage of archaeology.*

3.17 While the Management Plan identifies those bodies and organisations that will have ownership of the Plan, it is clear from comments received that there is still some confusion over whose Plan it is. The production of the Action Plan will help to clarify this point, but it is thought that some additional text at this stage would be helpful. *It is recommended that the ownership of the Plan is given greater clarity.*

3.18 Following discussion with colleagues from City Development, the following more detailed points were agreed:

- The Tourism Action Plan 2004-2007 should be added to the list of non-statutory guidance (page 20/21)
- The World Heritage Site Manifesto should be listed under non-statutory guidance (page 20/21)
- Under reference to ELTB (page 46) - should note that ELTB will cease to exist after 31 March 2005
- Needs to be made clearer that specific aspirations and actions will be articulated in the Action Plan
- The role of the buffer zone needs to be explained (page 27)
• Comments relating to congestion charging under Policy 6 (page 28) may suggest opposition. The issue in question relates to the impact of transport infrastructure and will be covered by the Edinburgh Standards for Streets (the revised Edinburgh Streetscape Manual)

• Policy 24 (page 32) refers to reinstatement of lost fabric but should more appropriately refer to maintenance of historic buildings along Princes Street

• Policy 30 (page 32) should better reflect the wording in the Memorandum of Guidance on Listed Buildings and Conservation Areas

4 Financial Implications

4.1 None.

5 Conclusions

5.1 In general, the Management plan has been well received. The majority of the comments relate to matters of detail and can be accommodated in the finalised document.

6 Recommendations

6.1 It is recommended that the Committee notes the comments received and agrees that this report be forwarded to EWHT as the Council's response to the consultation on the EWHS Management Plan.

Andrew M Holmes
Director of City Development
<table>
<thead>
<tr>
<th>Appendices</th>
<th>Appendix 1: Comments and Assessment.</th>
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<tbody>
<tr>
<td>Contact/tel</td>
<td>Will Garrett (0131) 469 3634</td>
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<tr>
<td>Wards affected</td>
<td>All</td>
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<tr>
<td>Background Papers</td>
<td>Edinburgh World Heritage Site</td>
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<td></td>
<td>Management Plan: Report to Planning</td>
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<td>Committee, 5 August 2004, Item No 14,</td>
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<td></td>
<td>and its attached consultation draft of the</td>
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<td>WHS Management Plan.</td>
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# APPENDIX 1

## COMMENTS AND ASSESSMENT

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<tr>
<th>COMMENT</th>
<th>SOURCE</th>
<th>ASSESSMENT</th>
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<tbody>
<tr>
<td>Proposals to reduce proliferation of street furniture and signs should not include waste containers (policy 42)</td>
<td>EandCS</td>
<td>Work with ECS to find acceptable wording. (Suggest 'rationalise' rather than reduce)</td>
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<tr>
<td>Remove reference to stabilising headstones in their original position (policy 73)</td>
<td>EandCS</td>
<td>Graveyards and headstones an important part of the heritage. Need to find acceptable wording that supports the principle of their retention and stabilisation.</td>
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<tr>
<td>Environmental and Consumer Services should be mentioned along with other Council departments on pages 44/45</td>
<td>EandCS</td>
<td>Agree</td>
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<tr>
<td>Insert “and parks” under responsibilities of Culture and Leisure on page 44</td>
<td>Culture and Leisure</td>
<td>Agree</td>
</tr>
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<td>Education and Outreach Manager now re-titled “Learning and Access Manager” on page 45.</td>
<td>Culture and Leisure</td>
<td>Agree</td>
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<td>Burial grounds and parks should be distinguished as they have different functions and different associated legislation (policy 73)</td>
<td>Culture and Leisure</td>
<td>Agree</td>
</tr>
<tr>
<td>Also under policy 73 would wish to see introduction of “important” in relation to stabilising of headstones</td>
<td>Culture and Leisure</td>
<td>Agree, but see comments from ECS above</td>
</tr>
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<td>Page 15/16 contains some factual errors relating to the chronology of the monuments on Calton Hill</td>
<td>Culture and Leisure</td>
<td>Agree</td>
</tr>
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<td>The Plan should recognise the existence of various initiatives including the Parks and Gardens Strategy, the Parks and Sports strategy the Princes Street Garden lottery bid, and the Calton Hill working group.</td>
<td>Culture and Leisure</td>
<td>Agree</td>
</tr>
<tr>
<td>The section on Culture and Leisure (page 44) should reflect the full range of responsibilities including Parks and Sport management and management of the public tree stock</td>
<td>Culture and Leisure</td>
<td>Agree</td>
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