

## Edinburgh World Heritage Site Management Plan

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**Planning Committee**  
**21 April 2005**

### **1 Purpose of report**

- 1.1 To seek Committee's approval of the Edinburgh World Heritage Site Management Plan, following consultation.

### **2 Summary**

- 2.1 Following the approval of a draft Edinburgh World Heritage Site Management Plan by Committee in August 2004, the Edinburgh World Heritage Trust (EWH) has carried out an extensive consultation exercise. The Management Plan has been extensively modified in the light of the comments received and Committee is now asked to approve the revised version of the Plan.

### **3 Main report**

- 3.1 On 5 August 2004, Committee approved, for consultation, a draft Edinburgh World Heritage Site Management Plan prepared by the Edinburgh World Heritage Trust (EWH). It was agreed at the time that an internal consultation process within the Council would ensure that all the key departments had the opportunity to feed in to the process. This was carried out and the results reported to Committee on 24 November 2004. Committee approved this report as the Council's response and it was forwarded to EWH as part of their wider consultation process.

#### Consultation Process

- 3.2 EWH have produced a report on their consultation process and this is reproduced as Appendix 1. They carried out an extensive consultation exercise involving a press launch, open evenings and an exhibition. Every property in the World Heritage Site received a publicity leaflet and copies of the Management Plan were distributed widely, as well as being available for download via the EWH website. In all, 460 hard copies of the Management Plan were distributed to public and private sector organisations and community groups. 83 written responses were received and a digest of these responses and the EWH response to them is available as a background paper.

## Consultation Findings

- 3.3 Encouragingly, 96% of all respondents agreed with the vision for the future of the World Heritage Site. Furthermore, nearly 80% of respondents agreed with the way the balance between protection and development was presented. The rest were split evenly between those who favoured greater protection and those who thought less protection was appropriate.
- 3.4 The greatest perceived threat to the character of the World Heritage Site was thought to be the intrusion of new development, particularly tall buildings.

## Key themes and responses

- 3.5 Below are listed the main themes that emerged from the consultation and the responses of EWH.

- Although there was a high level of support for the main aims of the plan, English Heritage and ICOMOS suggested a more comprehensive vision statement.

*Response: The Plan has been revised accordingly with a stated vision at the start of Chapter 1*

- Some confusion was expressed over the 'ownership' of the Plan

*Response: This has been clarified with emphasis on partnership*

- The balance between protection and development was criticised by a few individuals who favoured one of the extremes

*Response: This criticism is not accepted. It is thought the balance in the Plan is correct*

- A number of people thought the Outstanding Universal Values (OUVs) were not adequately identified. ICOMOS, English Heritage and Historic Scotland made technical comments on the draft.

*Response: This section of the Plan has been strengthened with a clearer description of the OUVs of the Site.*

- A number of comments were made on the section covering Risks, Policies and Proposals, suggesting strengthening in some areas and reduction of repetition in other areas.

*Response: The charts in Chapter 5 have been revised to show only the risks to the OUVs and the policies that will address those risks.*

- The coverage of archaeology was considered to be inadequately addressed.

*Response: The text covering archaeology has been significantly extended and new policies added.*

- The lack of affordable housing within the World Heritage Site was introduced as an issue.

*Response: A specific policy has been added to cover this.*

- A number of respondents felt the role that residents and Resident Associations play was inadequately covered.

*Response: The important role of the residential community has been acknowledged.*

- General increased public access to the gardens was not supported

*Response: It is accepted that general increased public access to mutually owned private gardens in primarily residential areas is not appropriate.*

- Several traffic related comments were received, often conflicting.

*Response: No action has been taken in response to this. The Plan supports measures to promote sustainable modes of transport.*

- The inventory of important buildings came under scrutiny as individuals questioned the inclusion or exclusion of certain buildings.

*Response: It has been decided to omit this section as such information is widely available elsewhere.*

3.6 The Council made its own comments on the draft report and these were reported to Committee on 24<sup>th</sup> November 2004 and forwarded to EWH. The specific issues that concerned the Council are listed below, followed by the response from EWH.

- The relationship between the Management Plan and the Action Plan requires clarification

*Response: The text has been strengthened in Chapter 1 and a new chapter on Implementation has been added referring to the purpose and role of the Action Plan.*

- The relationship between the Management Plan and the Local Plan requires clarification

*Response: An expanded explanation of the relationship is contained in Chapter 4 'Management Strategy and Policy Context'*

- The development of a coherent set of policies for the World Heritage Site would be beneficial

*Response: the charts in Chapter 5 have been revised, making the policy context clearer and relegating actions to the Action Plan*

- The development of a set of priority items should be included in the Action Plan

*Response: key issues for early action will be prioritised in the Action Plan*

- The coverage of archaeology requires strengthening

*Response: This has been expanded in Chapter 2 and new policies inserted into Chapter 5 Section 10 'History and Heritage'.*

- Ownership of the Management Plan is not clear

*Response: The issue of ownership of the Plan has been set out with greater clarity. Emphasis is given to the importance of partnership in delivering the Plan.*

#### The Final Document

3.7 The final document has been changed and now forms a significantly enhanced and more robust Plan. Chapter 1, the Introduction, explains the background to the Plan, the need for a Plan and carries a short description of the key parties responsible for managing the Site as well as a vision for the Site. Chapter 2 contains a description and history of the Site. This has been strengthened as a result of the consultation process. Chapter 3 describes the significance of the Site and carries a Statement of the Outstanding Universal Values of the Site. This has also been considerably altered and improved from the draft plan approved for consultation. Chapter 4 sets out the Management Strategy and Policy Context of the Plan and is more comprehensive than the consultation version. Chapter 5 remains the core of the document and has benefited from a rigorous editing process. Chapter 6 covers Promotion and Appreciation of the Site and a new chapter 7 on Implementation replaces the previous Chapter 7 entitled Next Steps.

3.8 Plans, maps and illustrations will be added to the approved text to enliven and illustrate the Management Plan.

#### The Approval Process

3.9 The World Heritage Convention requires all World Heritage Sites to have proper management arrangements in place. Because the World Heritage Convention is an international matter, responsibility for its implementation is not devolved. The State Party, on behalf of the whole of the UK, is the Department of Culture, Media and Sport. The UK government, as State Party signatory to the

Convention, has stated that a Management Plan is required for all UK World Heritage Sites. Since devolution, responsibility for heritage issues lies with the Scottish Executive, through Historic Scotland and Historic Scotland ensures that Scottish sites meet the terms of the Convention. In coming to their view on the efficacy of the Management Plan, DCMS will seek the advice of English Heritage and ICOMOS. Once satisfied, the DCMS will pass the Management Plan on to UNESCO.

#### **4 Conclusions**

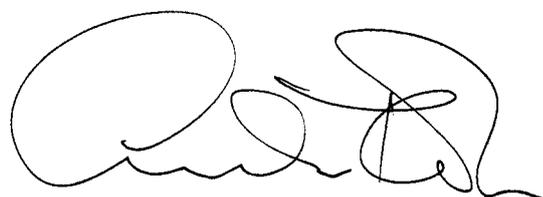
- 4.1 The Management Plan has been extensively revised in the light of comments received from a wide range of consultees during the consultation process. Particular attention has been paid to the comments, input and advice received from the Council, Historic Scotland, English Heritage and ICOMOS all of whose views will have a direct influence on the final approval of the Plan. It is now considered that the Plan is complete and ready to be forwarded to UNESCO via the State Party.

#### **5 Financial Implications**

- 5.1 None

#### **6 Recommendations**

- 6.1 It is recommended that the Committee approves the text of the draft World Heritage Site Management Plan so it can be fully illustrated and then forwarded to the Department of Culture, Media and Sport.



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13.4.05

<b>Appendices</b>	<p>Appendix 1: Report on the Edinburgh World Heritage Site Management Plan Consultation Exercise written by Edinburgh World Heritage. March 2005.</p> <p>Appendix 2: World Heritage Site Management Plan</p>
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<b>Wards affected</b>	<p>All, especially: Murrayfield, Dean, Stockbridge, New Town, Broughton, Calton, Dalry, Tollcross, South Side, Holyrood.</p>
<b>Background Papers</b>	<p>Edinburgh World Heritage Site management Plan Consultation Responses</p>

# APPENDIX 1

## EDINBURGH WORLD HERITAGE

### REPORT ON THE EDINBURGH WORLD HERITAGE SITE MANAGEMENT PLAN CONSULTATION EXERCISE

#### 1. Purpose of this report

The draft Edinburgh World Heritage Site Management Plan was approved for public consultation by the Board of Edinburgh World Heritage (EWH), the City of Edinburgh Council's Planning Committee and Historic Scotland in July and August 2004. Following this approval process, Edinburgh World Heritage conducted a public consultation exercise between September and November 2004. This report summarises the consultation process and its results.

#### 2. The Consultation Process

##### 2.1 Aim:

The aim of the public consultation exercise was to engage as wide a section of the World Heritage Site's communities as possible.

##### 2.2 Consultation Process and Publicity

Publicity for the consultation exercise was aided by a Press Reception in early October 2004 which received good coverage in major publications.

A publicity leaflet was sent to every property in the World Heritage Site. This informed residents and businesses of the consultation process, invited them to one of the two Open Meetings and advised that copies of the Management Plan could be obtained from the EWH website or offices.

The Management Plan was sent directly to a wide selection of public and private sector organisations with an interest in the World Heritage Site including community associations and local libraries. 460 hard copies of the Management Plan were distributed in this way and an additional unknown number were downloaded from the EWH web site.

An exhibition was also produced by EWH to promote the consultation process. This was displayed at EWH's offices, the Council's Planning Department and local libraries.

The two Open Meetings held at EWH Offices were well attended.

##### 2.3 Options for submitting responses

Comments were invited both in written form and by completion of a response form. The latter combined multi choice questions with an invitation to comment on specific subjects.

#### 2.4 Length of consultation period

The main part of the consultation period ran for 12 weeks between August and November 2004, although responses continued to be accepted and considered until 7 December 2004.

#### 2.5 Level of Response

83 written responses were received and these were split fairly evenly between letters and the submission of a completed response form with many parties completing both. This level of response compares favorably with consultation exercises in other UK sites.

#### 2.6 Management of Response

A digest was produced of all written responses and of the opinions expressed on the response form.

### **3. GENERAL FINDINGS FROM THE RESPONSE FORM**

#### 3.1 Breakdown of Respondents

Local Residents	47%
Local Workers	11%
Organisations	43%

#### 3.2 Agreement with Overall Vision

An overwhelming 96% of all respondents agreed with the vision for the future of the World Heritage Site set out in the Management Plan.

#### 3.3 Balance between Protection and Development

78% of all respondents agreed with the way that the balance between protection and development was described within the Management Plan. 9% thought the balance favoured protection while 13% thought that the balance favoured development.

#### 3.4 Agreement with Statement of Significance and the Risks Facing the Site

60% of respondents agreed that the Plan contained all the key factors relating to the World Heritage Site's significance and the risks which face it. The remainder suggested that additional issues should have been identified and these have informed revision of relevant sections.

#### 3.5 Perception of Greatest Risk

The intrusion of new development, particularly tall buildings, was considered to be the greatest risk to the character of the World Heritage Site.

### **4. MAIN THEMES EMERGING FROM THE CONSULTATION**

The majority of written comments related to matters of detail. Many of these comments were very useful and have resulted in detailed changes to the text.

A considerable number of other comments refer to matters outside the scope of the Plan and although these may guide future thinking, they have not been included in the Plan at this time.

From the remainder, some larger themes concerning more significant issues have emerged. These and the drafting team's response are discussed below:

#### 4.1 Main Aims of the Plan

Although there was a very high level of public support for the main aims of the Plan, both English Heritage (technical advisors to the State Party) and ICOMOS (technical advisors to UNESCO) suggested a stronger or more comprehensive Vision Statement.

*Response:* Agreed; the Plan has been revised accordingly.

#### 4.2 Ownership of the Plan and its implementation

Misunderstanding was expressed regarding 'ownership' of the Plan and, in particular, the role of Edinburgh World Heritage. Many parties thought that the Plan should only include action which EWH could deliver. Others questioned the effectiveness of the Plan given EWH's lack of statutory powers and that the Plan failed to identify resources available to support its delivery. Others questioned how the Plan will integrate with other policy documents, for example, the Local Plan and City Centre Action Plan.

*Response:* Partly agreed. It is accepted that the Plan could more clearly set out its purpose and ownership and this has been addressed. However, the fundamental point of the document is that it is a partnership document, the role of which is to co-ordinate the work of all the organisations involved in the management of the World Heritage Site. The ownership of the Plan must, therefore, be as wide as possible. This has been expressed more clearly in the revised version.

Whilst EWH accepts that it has no statutory power, it believes that this should be regarded as an advantage and that its role is primarily to co-ordinate, facilitate and influence. The description of EWH's core aims has been rewritten to underline this.

In response to comments concerning implementation of the plan, an additional chapter has been written which includes a clear explanation of how the Plan will be implemented.

#### 4.3 The Balance Between Protection and Development

A key issue for the Plan is achieving the correct balance between protecting the Site's historic fabric and townscape and facilitating its future adaptation to meet the needs of modern living. A few strong assertions were made suggesting that the plan strongly favoured one of these extremes.

*Response:* Not agreed. The Management Plan recognises that the World Heritage Site must evolve and respond to the challenges of a capital city. The responses elicited from the response form show that by far the greatest number of respondents considered that the balance of the plan was correct. Of the remainder, the balance was roughly equal between those wanting greater emphasis in favour of protection or development.

#### 4.4 Statement Of Significance

A significant number of parties thought that the Outstanding Universal Values of the World Heritage Site were not identified adequately. Generally, these concerns centred on the importance of townscape. In addition, UNESCO's technical advisors (ICOMOS), the State Part's technical advisor (English Heritage) and Historic Scotland made technical comments about the structure and scope of this section.

*Response:* Agreed. It was accepted that this section of the Plan should be strengthened by providing clearer descriptive analysis of each of the Outstanding Universal Values of the Site

#### 4.5 Risks, Policies And Proposals

The many comments received suggested detailed changes which could result in the general strengthening of this section. Other comments pointed out a considerable amount of repetition as various themes or responses reoccurred against various risks. In addition, parallel work by the consultative group drafting the Action Plan suggested that separating the policies and proposals for action would lead to clearer presentation of a coherent set of policies.

Response: Agreed. The charts in chapter 5 have been revised so that they show only the risks threatening the outstanding values of the Site and the policies which address those risks. Proposals for action will now only be shown in the Action Plan. This approach has eliminated the need for repetition. In addition, much of the text has been re-worded to make the policy content clearer and a number of minor gaps or inadequacies, identified by the consultation process, have been filled.

#### 4.6 Archaeology

Various parties suggested that the implication of archaeology within the World Heritage Site was insufficiently addressed.

Response: Agreed. Three new policies have been inserted in section 10, 'History and Heritage', together with explanatory text elsewhere in the Plan.

#### 4.7 Affordable Housing

Several respondents saw the lack of affordable housing as a risk.

Response: Agreed. A specific policy has been added.

#### 4.8 Public Access To Gardens

Several comments were made at public meetings and by specific representations objecting to policies proposing wider public access to gardens.

Response: Agreed. It is accepted that it is generally inappropriate to increase public access to mutual private gardens in primarily residential area and the Plan has been revised accordingly. The text has also been revised to clarify the intention that, where public access to gardens is increased, this should not be at the cost of losing their quiet, green and reflective character.

#### 4.9 Residents and Residents Associations

Many comments were received suggesting that the role and contribution of residents and residents association were not adequately recognised. Others commented that the residential nature of sections of the Site had not been sufficiently identified nor had the need for future communication with residents.

Response: The Plan has been strengthened to acknowledge the important role that the residential communities play in the maintenance of many buildings through their ownership responsibilities and through owners' groups encouraging the appropriate authorities to maintain the public realm.

#### 4.10 Transport and Pollution

Traffic related comments were numerous and conflicting and included the need to recognise the car as an important feature of modern life; the over domination of the car in the World Heritage Site;

the levels of pollution caused by traffic and the serious problems caused by traffic volumes in the City Centre.

Response: No action in relation to the Plan. The Management Plan supports measures to promote sustainable modes of transport within the Site and looks towards introducing measures for reducing overall traffic levels and on-street parking.

#### 4.11 Inventory of Important Buildings

There were many comments questioning the justification for omitting certain buildings and the inclusion of others.

Response: Given the wide availability of information on buildings, it was decided that this section did not add significantly to the Plan and should be omitted.

### **5. RESPONSE TO COMMENTS RECEIVED FROM CITY OF EDINBURGH COUNCIL INTERNAL CONSULTATION PROCESS**

In general, the City of Edinburgh Council supported the Management Plan. However, a number of relevant and helpful comments were received and acted upon:

#### 5.1 Relationship between Management Plan and Action Plan

Response: Agreed. Text has been strengthened in Chapter 1 and a new Chapter ('Implementation') has been added which also refers to the Action Plan and its purpose. See 4.2 above.

#### 5.2 Relationship between the Management Plan and the City Local Plan

Response: Agreed. The relationship between the Management Plan and other policy documents including the City Local plan has been described in Chapter 4 'Management Strategy and Policy Context'. See 4.2 above.

#### 5.3 Policies should be separated and form a coherent set of policies for the World Heritage Site

Response: Agreed. See 4.5 above.

#### 5.4 Key issues affecting the World Heritage Site over the next few years should be identified and set as priorities for action within the Action Plan

Response: It is considered that the 'Risks' set out in Chapter 5 reflect key issues likely to affect the World Heritage Site over the next few years. It is agreed that these should be prioritised within the Action Plan.

#### 5.5 The Management Plan should elaborate on its limited coverage of archaeology

Response: Agreed. See 4.6 above.

5.6 Ownership of the Management Plan should be clarified

Response: Agreed. See 4.2 above.

5.7 Detailed Points

A number of detailed points were also made which have been addressed.

Edinburgh World Heritage, March 2005