

New Town And Broughton Community Council

Response To The Old and New Towns of Edinburgh World Heritage Site Management Plan: draft for consultation

Introduction

The following contains the response from the New Town And Broughton Community Council (NTBCC) to the consultation on **the Old and New Towns of Edinburgh World Heritage Site Management Plan: draft for consultation**. NTBCC and many of its linked residents associations have a direct and ongoing interest in the protection and promotion of the New Town's world heritage status and wishes to see proposals coming forward to develop the forms of engagement held with Edinburgh World Heritage. Therefore, the formal consultation on the World Heritage Management Plan is welcomed and is viewed as an opportunity to bring about a significant change to arrangements for engagement and involvement of local stakeholder organisations in the work of Edinburgh World Heritage, including NTBCC and its linked resident associations.

Our response has been formulated following a meeting on 25 March with Jenny Bruce, Old & New Towns of Edinburgh World Heritage Site Co-ordinator, and Wendy MacAdie, Operations and Finance Manager, Edinburgh World Heritage Trust. The meeting was very constructive and particularly helpful in clarifying a number of important matters.

The response from NTBCC reflects a general position that there are some important issues that it would wish to see addressed as part of wider progress with the Management Plan. Some of these relate to the Management Plan itself, others are concerned with the organisational structures that are supposed to oversee and take forward that Plan.

Comments On The Management Plan

The World Heritage Site Management Plan contains important statements surrounding the challenges to be addressed and objectives to be pursued. Some of these are familiar and would obviously be expected to be included, but it is helpful to see these clearly articulated. The Management Plan provides much of value on background on the World Heritage Site (WHS) and what the priorities are for the future.

However, there are some specific comments that NTBCC wish to make. Firstly, more needs to be done to describe the basis upon which the challenges in the Plan were finally determined and agreed. This will give clarity about who contributed to them and how they were signed off among the various participants identified. This is important to set out the basis of support and endorsement behind the draft of the Management Plan and the degree of consensus backing it.

Secondly, the Management Plan sets out the background to protecting and promoting the WHS but does not specify what changes are expected to happen over the forthcoming ten years in support of this. It would be helpful to see this addressed. At the moment it is not sufficiently apparent what specifically the Management Plan seeks to achieve in terms of protection and improvement within the WHS. It is important that the Management Plan offers a well-defined description of how the WHS will look different than it otherwise would have over the next ten years. Such an understanding of where change is expected will be immensely helpful to the work of NTBCC and other partner organisations in seeing the bigger, strategic picture. It also means that there will be a sound basis upon which to assess, supported by appropriate measures, progress with the Management Plan over the coming years

Thirdly, within the Management Plan 2024-2035 there is helpfully a Draft Action Plan 2024-2026. The Action Plan however can be developed further. Firstly, it is suggested that the objectives should encompass specific and measurable end-points. Secondly, and relatedly, the actions, which at the moment read more like ongoing responsibilities, could be set out in a time-specific and more precise format that indicates what will be done to achieve the objectives. All of this will facilitate the effective monitoring and assessment of progress with the Action Plan by any and all parties.

Fourthly, it is necessary that the Management Plan gives greater prominence to the importance of the cityscape within the WHS. This is a critical part of the intrinsic and integral value of the WHS, but which has been vulnerable to the design and form of development proposals being brought forward in the City along with other actions taken by the City Council in recent years.

Comments On Management Arrangements For The World Heritage Site

In addition to the Management Plan, there are a number of important points to be made about the wider planning and management arrangements that should underpin and support the Management Plan.

Firstly, and critically, it is not clear to NTBCC how the Management Plan will be taken forward. There is no definitive statement about arrangements for overseeing progress and involving partners in the section covering Implementation and Monitoring. It is really crucial that this is addressed.

Secondly, the current management arrangements raise for NTBCC a number of specific points of concern. These are listed:

- The position of the Steering Group that is responsible for the day-to-day management of the WHS is uncertain in that it is not evident what are the accountability arrangements that underpin it. NTBCC also understands the work of the Steering Group is not placed in the public domain and shared with other local organisations. This does not help effective partnership working.

- The proposal to constitute an Oversight Group (which was set out in the 2017 Management Plan, but never convened) is welcomed. It is important that there is clarity about its membership, remit, governance and specifically its relationship to the Steering Group. It is acknowledged that forming an Oversight Group offers an opportunity to improve transparency and openness regarding the Steering Group. Importantly, the Oversight Group's membership should include a wide body of interested parties drawn from the WHS beyond the formal partners. Ideas regarding this could usefully be drawn from established practice in other UK World Heritage sites where wide-ranging involvement occurs.
- The Management Plan makes multiple references to partners but the nature of any partnership, which is crucial for the future of the WHS, is not defined. In particular, there is no recorded partnership agreement in place. In addition, while the Management Plan refers to four Management Partners - The City of Edinburgh Council, Historic Environment Scotland, Edinburgh World Heritage and Stakeholders – NTBCC's understanding is that there is an unspecified difference in status and authority between the first three and the last of these. This needs to be properly reviewed and clarified. More broadly, it is important that the knowledge, expertise and commitment that a wider range of interested parties/partner organisations can bring to the collective effort of protecting and promoting the WHS is acknowledged in the formal management arrangements to give real substance to the notion of partnership working.
- As was discussed at our meeting, Edinburgh World Heritage is in the process of reviewing its governance arrangements, but this is not reflected or anticipated in the Management Plan leaving progress with the Plan in a potentially ambiguous position.
- There would be benefit in expanding upon the position of the City of Edinburgh Council in relation to the WHS given its pivotal position as the planning authority and its lead role in the coordination and management of the WHS. NTBCC would support the position where the Council's involvement in the WHS fell to the full Council rather than the Planning Committee. In the first place this would increase the status afforded to the WHS. Moreover, it would explicitly recognise that the impact of the Council's policies and decisions on the WHS goes well beyond the Planning Committee. More broadly, a fuller statement of the commitment by the Council to the WHS would be welcomed. This would give reassurance about the priority afforded by the Council to protecting the WHS and should indicate how conflicting priorities might be managed especially around the development of tourism, housing and green space in the WHS.

Conclusions

NTBCC is of the opinion that:

- further work should be undertaken on the Management Plan to give further substance to the changes envisaged;

- there be a systematic review of the planning, management and governance arrangements surrounding the WHS to ensure successful progress of the Management Plan; and
- a properly considered programme to extend significantly the involvement of a range of stakeholders (as found in other World Heritage Sites in the UK) in producing and taking forward plans for the WHS is developed.

NTBCC with many others who have relevant expertise are ready, willing and able to play a constructive part in the development of all of the above points. However, it is anxious that the scope of what is required and importance of actively engaging partners is fully recognised.

Peter Williamson
Chair, New Town & Broughton Community Council
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