

Ms Laura Davies
Ambassador
Permanent Delegate of the United
Kingdom of Great Britain and Northern
Ireland to UNESCO
35 rue de Faubourg St Honoré
75008 Paris

7 April 2023

**Culture Sector
World Heritage Centre**

Ref: CLT/WHC/EUR/23/14274

Dear Ambassador,

Dear Laura,

I wish to inform you that IUCN has completed its Technical Review of the planning documents of the proposed Energy Reclamation Facility at Portland near the World Heritage property '**Dorset and East Devon Coast**', transmitted by the Department for Digital, Culture, Media and Sport to the World Heritage Centre on 26 January 2021.

IUCN considers that, based on the documents provided, there would not be any direct physical impact on the geological attributes that constitute the Outstanding Universal Value (OUV) of the property under criterion (viii), since the project would be located outside the boundaries of the property itself. However, IUCN considers that the wider setting of the World Heritage property, in which the development would be located, is an important part of the visitor experience of the property and its World Heritage values. To respond to the potential increase in industrialization of the wider setting of the property that would result from the Energy Reclamation Facility at Portland and the effect this may have on the naturalness of the property, it is recommended that potential measures to mitigate increased traffic impacts be considered in the assessment and decision-making process.

In addition, while IUCN welcomed the inclusion of a specific chapter on World Heritage in the impact assessment, the Advisory Body also noted that the assessment was informed by the ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, instead of the IUCN World Heritage Advice Note on Environmental Assessment, which would have been more relevant in this case. As you know, in 2022, both guidance documents have been replaced by the new *Guidance and Toolkit for Impact Assessments in a World Heritage Context*¹, which applies to both natural and cultural heritage. I would thus like to seize this opportunity to encourage your competent authorities to use the new guidance tool to assess the potential impacts on the OUV of World Heritage properties located in the United Kingdom.

I would be grateful if you could share the enclosed Technical Review (see **Annex**) with your competent authorities for their consideration and keep the World Heritage Centre informed of the follow-up provided to them. I further invite your competent authorities to provide an update to the World Heritage Centre on any pertinent developments in the planning scheme for the Energy Reclamation Facility.

¹ Available at <https://whc.unesco.org/en/guidance-toolkit-impact-assessments/>.

As is customary, the World Heritage Centre and IUCN remain at your disposal for further clarification or assistance as required.

I thank you for your continuous collaboration and support in the implementation of the World Heritage Convention and remain,

Yours sincerely,



Lazare Eloundou Assomo
Director

Enc.: IUCN Technical Review of the Energy Reclamation Facility at Dorset (February 2023)

cc: United Kingdom National Commission for UNESCO
Nation Focal Point for the Implementation of the Convention
IUCN

IUCN Review of the Energy Reclamation Facility in the vicinity of the World Heritage property 'Dorset and East Devon Coast', received by the World Heritage Centre on 20 February 2023.

IUCN thanks the State Party of the United Kingdom of Great Britain and Northern Ireland (the State Party) for the documents submitted in 2021 for the proposed Portland Energy Reclamation Facility (ERF) that would be located in the vicinity of the Dorset and East Devon Coast World Heritage property (the property). The documents provided include the impact assessment for the proposed project, with a specific chapter on World Heritage (*Chapter 13: Environmental statement World Heritage site*), and a letter from the Jurassic Coast Trust (dated October 2020). IUCN also reviewed a statement by the Portland Town Council, received on 26 September 2021.

The property is inscribed on the World Heritage List under criterion (viii) for its geological and geomorphological features including coastal exposures along the Dorset and East Devon coast which provide an almost continuous sequence of Triassic, Jurassic and Cretaceous rock formations spanning the Mesozoic Era and document approximately 185 million years of Earth's history.

IUCN welcomes that World Heritage is specifically addressed in a dedicated chapter and that the process includes consultation with the Jurassic Coast Trust. It is important to note that the assessment was developed using the ICOMOS Guidance on Heritage Impact Assessments for World Heritage "*in the absence of specific guidance on assessment of the effects on the natural site*" (paragraph 13.36). In this regard, IUCN highlights that the ICOMOS Guidance applies specifically to the assessment of properties inscribed for cultural heritage. Since the property is inscribed as a natural site, the assessment of impacts on the natural values would have been more appropriately carried out using the [IUCN World Heritage Advice Note on Environmental Assessment](#). In this regard, a new [Guidance and Toolkit for Impact Assessments in a World Heritage Context](#), which is applicable to both natural and cultural heritage, was published in 2022 and replaces the ICOMOS and IUCN guidance going forward.

Specific to the potential impacts of the proposed project on the Outstanding Universal Value (OUV) of the property, based on the documents provided in 2021, IUCN considers there would not be any direct physical impact on the geological attributes that constitute its OUV under criterion (viii), since the project would be located outside the boundaries of the property itself (and as similarly concluded by the Jurassic Coast Trust regarding a lack of impact on the "functional setting").

Regarding the assessment of potential visual impacts on the wider landscape of the property, the proponent concluded that the "predicted visual change to the WHS itself is negligible" (paragraph 13.47). Given the location of the building in an already industrial port setting, the Jurassic Coast Trust considered the building itself would "*not represent significant damage to the setting of the WHS*", but raised concerns regarding the overall increase in industrialisation of the coast and potential impact of the views from the property being "*of an industrial or natural coastline*". IUCN considers that this wider setting is an important part of the visitor experience of the property and its World Heritage values. In this regard, IUCN also notes the concerns raised by the Portland Town Council (Council), that the presence of a waste incinerator may impact on the overall tourism and visitor experience of the area including the World Heritage site, as well as the Council's tourism strategy of a "Portland-clean environment". IUCN agrees with the aforementioned concerns regarding the potential increase in industrialization of the wider setting for the property and the effect this may have on the naturalness of the

property. Specifically, regarding the traffic congestion concerns raised by Council (i.e. “*an additional 80 lorry movements per day*”), it is noted that an increase in traffic has the potential to impact the visitor experience of the World Heritage property, and potential measures to mitigate increased traffic impacts should be taken into consideration in the assessment and decision making process.

IUCN remains available for any technical advice to the State Party on World Heritage matters, as required.