

Dorset and East Devon Coast World Heritage Site Management Plan 2009-2014

CONSULTATION REPORT, JULY 2009

A summary of key issues raised and alterations made to the Draft WHS Management Plan resulting from the public consultation exercise, to be read in conjunction with two annexes¹:

ANNEX 1: DETAILED SCHEDULE OF RESPONSES TO CONSULTATION

ANNEX 2: QUESTIONNAIRE RESPONSES



United Nations
Educational, Scientific and
Cultural Organization



Dorset and East Devon Coast
inscribed on the World
Heritage List in 2001

¹ all available on www.jurassiccoast.com/plan

1 Background

1.1 Introduction

This Dorset and East Devon Coast WHS Draft Management Plan Consultation Report describes the process used for the consultation and gives an analysis of the key issues that the consultation provoked. It further outlines the key changes that will be made to the Plan in light of this analysis, all of which have been approved by the Dorset and East Devon Coast World Heritage Steering Group. It should be read not just in conjunction with the Draft Plan itself, but particularly with the accompanying document, the 'Schedule of responses to consultation', which lists all comments received, and the Jurassic Coast World Heritage Team's response to them, on behalf of the above mentioned Steering Group.

1.2 The consultation

The Plan was consulted on between March 31st 2009 and June 9th 2009. Responses received by June 19th 2009 were considered, and several Steering Group partners indicated that their comments were still outstanding at that date.

The details of the consultation was widely publicised in the press, through emails, letters, and posters in Libraries and other public places. It was signposted on the home page of www.jurassiccoast.com, with the Plan and accompanying documents all available for download. A dedicated email address consult@jurassiccoast.com was set up to receive comments.

In total 374 copies (including some which were excerpts only) of the draft Plan were distributed in the following way:

Organisation / distribution method	Number of locations or organisations	Copies of Plan (or excerpts) distributed
Available for general public	21 libraries	130
Local Authorities and Parish Councils	46	63
Visitor Centres, Museums and Outdoor Studies Centres	43	48
Steering Group partners, IUCN & UNESCO	45	52
Other key public sector regional and national agencies	26	26
Other NGOS and Public sector	25	25
Individual public requests	18	30
Total	224	374

In addition, notification of the Plan and how to access it was emailed to 185 members of Jurassic Coast working groups, 48 members of the Science and Conservation Advisory Network and more than 300 artists on the Jurassic Coast Arts mailing list. Finally, presentations were undertaken to Committees of three of the four District-level councils along the coast, the timing of the elections making similar presentations at County level not feasible.

1.3 Responses

A total of 78 official responses were received, 15 from members of the public, 26 from Steering Group members and 37 from other organizations. This has resulted in more than **800** individual comments. Although some of these relate to small corrections and typos, many interesting and relevant comments have come from a wide range of individuals and organizations.

All responses were put into the Schedule of responses and examined according to certain criteria. These criteria were agreed by a sub-group of the Steering Group, which set the standards and consistency for the responses. The remainder of the comments not covered when the sub-group met were done by the Team Leader, with cross-checking from the Management Group. The agreed criteria are below.

1.3 Criteria to be used for analysis of consultation feedback

The following criteria (based on those used by the Dorset AONB) have been used here to ensure clarity and consistency in the process of editing of the Draft Management Plan

A	Incorporated	The comment makes a valuable point which will be incorporated directly or in a modified form into the text.
B	Explained	The comment seeks better explanation, or there is obvious mis-interpretation of the current text. In response to such comments, clearer description will be incorporated into the text.
C	Modified	The comment seeks to modify an aspect of the Management Plan. This modification is considered appropriate and will be incorporated.
D	Resolving issues	The comment forms part of a set of comments made around a key issue over which there are clear differences of opinions. The issue has been discussed, and any changes to the Plan resulting from that discussion have been approved by the World Heritage Steering Group. The changes are published in this report.
E	Not Incorporated	The comment, while valuable and noted, is either too detailed, not relevant or conflicts with the agreed approach of the Plan and therefore has not been incorporated.
F	No Modification	A comment that is noted but has led to no modification either because it is supporting the existing approach, it is repeating points already made elsewhere in the Plan, or it is simply requiring some clarification.
T	Typographical errors, factual inaccuracies or minor suggestions	Alterations of this type will, if appropriate, be made directly in the final draft of the Plan

1.4 Summary

The sheer number, nature and extent of comments received during the consultation make the task of fully responding to all responses a very challenging one. There is no desire for the Plan to be lengthened, but reasonable and valid comments must be given due consideration. The criteria section above explains how each of these comments that fall under this section are treated, and the majority of incorporations, minor changes, or explanations will be made directly into this Plan and not discussed in this report.

It is inevitable that not all individual comments can be addressed, either because they are too detailed for a strategic plan of this nature, or because they would increase the length of the Plan significantly, or because they conflict with the primary purpose of the Plan. There will not always be a consensus of opinion, and some firmly expressed views may not lead to changes in policy, but by making public the responses to each comment (which are available in Annex 1), it can be shown that all the views expressed have been taken into account as transparently and comprehensively as possible.

The responses raised a number of key general themes that need to be addressed within the Plan. The main focus of this report therefore is to highlight these, discuss the issues briefly and present the changes agreed by the Steering Group.

2 Analysis

2.1 Introduction

Overall the comments and questionnaires received suggest a high level of support for the Draft Management plan. They also contain significant criticism, although this has come from a disproportionately small number of consultees. There has also been a great deal of excellent input, critical and useful suggestions, ideas and corrections. Some people have taken a significant amount of effort to comment on the Plan and their input is gratefully received.

2.2 Quantitative analysis - Questionnaire

A questionnaire was provided for consultation purposes. This can be seen at www.jurassiccoast.com/plan Of the 75 respondents, only 22 chose to use the questionnaire. Questions used gradings such as *Agree*, *Mostly Agree* and *Disagree*, and *Strongly Agree* to *Strongly Disagree*. These were given a score and averaged for the purpose of a very basic analysis².

The overall response to the questions was very positive, with a very small number of very negative scorings skewing the data slightly. Inevitably in this type of management context, people or organisations with single issues present strong cases, but the more quantitative type of analysis gives an indication of the relative weightings that might be given to any one argument. The outcome of this analysis is summarized below, and the data is available on request.

Questions 1 & 2

Q1. Did you know the Dorset and East Devon Coast (Jurassic Coast) is a World Heritage Site

Q2. Did you know why the Dorset and East Devon Coast is a World Heritage Site?

The answers to both questions 1 and 2 was **yes** from all respondents

Questions 3-7 and 9-10

Q3. Does the introduction provide enough background to this document, the World Heritage Site (WHS) and the history behind the designation?

Q4. If you have been involved in the WHS work programme, do you think that Section 1.6, "Review of progress since 2001" accurately reflects achievements?

Q5. Does the Statement of Outstanding Universal value explain clearly why the Dorset and East Devon coast is a World Heritage Site?

Q6. Does Chapter 3 clearly explain the arrangements for protection and management of the World Heritage Site?

Q7. Are the key issues and opportunities of Site management clearly explained?

Q9. To what extent do you agree with the Vision for the Site? (page 33)

Q10. To what extent do you agree with the Aims for the World Heritage Site? (page 33) There is an opportunity to comment on each aim on the next few pages.

The average scores for these questions were all between **1.14** and **1.86**, therefore between **Agree** and **Mostly agree**. This gives a very positive indication of support for this section of the Plan and the approaches taken.

Q8. Are there any issues or opportunities that you think we have missed?

The average score of **1.71**, it is closer to **no issues missed** than **some issues missed**.

Questions 11-18

The following three questions were asked of each aim:

To what extent do you agree with the draft aim?

To what extent do you agree that the draft policies support the aim?

To what extent do you agree that the draft actions and approaches support the policies?

The average scores for whether respondents agreed with the aims were all between **1.5** and **1.8**, therefore between **Strongly agree** and **Agree**. As with the scores for the earlier questions this gives a very positive indication of support for the aims of the Plan.

² Any 'don't knows' would have been excluded for purpose of analysis.

Broadly speaking, the scores for opinion on the policies and proposed actions were between **1.5** and **2**, therefore between **Strongly agree** and **Agree**, with only Aims 5, 6 and 8 showing policy and action scores at the **Agree** level and only the actions in aim 5 receiving the lowest score of **2.1**. This is consistent with the comments received.

Question 19

Q19. To what extent do you agree that the Plan considers the different types of experiences, and accessibility needs, that different groups of people might have of the World Heritage Site? For example, this might include people on low incomes, people whose first language isn't English, the elderly, young people, people with disabilities or people from black and minority ethnic communities?

The answers to this question averaged at 2.28, between **Agree** and **Neither disagree nor agree**, which indicates that the written responses need some attention.

2.3 Qualitative analysis

Overall, the Draft Plan was looked on favourably. Supportive comments are not addressed here, but are all contained in the Schedule. The general pattern was for specific chapters, aims, policies and actions to be supported or criticised when of specific relevance to individual consultees, with only a few responses taking a holistic view of the whole document.

All comments have been treated in a consistent manner as set out in section 1.2. In the majority of cases where a change (C), better explanation (B) or incorporation (A) are identified as being needed, the amendment will be relatively minor and will be done directly from the comments in the schedule, on discussion with a relevant expert in the Jurassic Coast Team or Steering Group.

However, some of the issues in the comments both from the questionnaires and the other 57 written submissions were expressed either sufficiently frequently, based on good evidence and with enough weight to warrant further discussion and clarification. **This section highlights and discusses these key issues and then identifies the changes (C1 to C10) agreed by the Steering Group on July 9th 2009.**

A. Governance

A number of consultees identified a need for clarity in the overall governance of the partnership whose role it is to produce and deliver the Management Plan for the Site, including some concern about the “*top heavy*” nature of the management structure and the “*risk that the management structure might take over*”. The recent review of governance arrangements by the Steering Group concluded in a series of recommendations designed to maintain effective structures with a minimum of bureaucracy.

The issue raised that “*Governance needs to be accountable down to the Parish Council level*” is one that is discussed below in G (community involvement) however, it is generally agreed that the governance of the Site should reflect views of all stakeholders as best it can but still be led by a manageable and fit-for-purpose body that accounts for the views and interests of the whole Site.

It was noted in the draft Plan that the governance would be elaborated on in the final document, but with little text as to how this might be achieved. In light of this, and the comments in response to the draft plan, the following change is agreed by the Steering Group:

- C1. Chapter 3.4 explaining the Management arrangements should be revised in light of the recent review of governance arrangements and in light of the comments made. This section should be moved to become part of Chapter 6, Implementation, with an additional summary statement about the Steering Group in the introductory Chapter 1.**

B. Buffer zones

World Heritage Sites are expected by UNESCO to have in place protection for their surrounding area – their setting. This is often done through an identified Buffer Zone as a ‘line on the map’, which, depending on national legislation and planning procedures, may or may not offer any additional protection. However, UNESCO offer an alternative approach which is *“where no buffer zone is proposed, the nomination should include a statement as to why a buffer zone is not required.”*

The alternative approach, based on protection through AONBs, SSSIs, Heritage Coast designations, and planning policies, has been adopted by the Dorset and East Devon Coast WHS Steering Group since before nomination, as there has been no legal instrument by which to establish a buffer zone under UK legislation, and the protection provided by AONB designations is excellent.

At early stages of preparing the nomination for the Site, there was a clear desire on behalf of the planning authorities and landowners not to have another layer of protection and bureaucracy which seemed to replicate what was already in place. This has recently been reiterated and a Steering Group sub-group set up to look at this in 2008 agreed that the existing arrangement should stay in place, with a review as part of the next Management Plan review in 6 years time.

Those who commented on this issue largely say that there should be a buffer zone, and either state or imply that currently, the setting of the Site is insufficiently protected. No comments provide specific evidence that the existing arrangements have been inadequate, most just think that there should be one, *“to provide the full protection required for the future of the site”*. However, it is highly unlikely that creation of a buffer zone would provide the sort of protection (e.g. against certain types of permitted development) that is sought by some consultees.

The weakness in the approach, identified in the draft Plan and by some consultees is that Portland is not in the AONB or Heritage Coast. This, however, demonstrates the importance of the relationship with the Planning Authorities (who sit on the Site’s Steering Group), who are responsible for the local planning policies which protect the Site’s setting.

The new planning circular on the protection of World Heritage Sites, and associated call-in regulations, will both improve the legal framework for protection of the Site and setting (the latter being very clearly stated in the document) and will allow Local Authorities to be clearer about their responsibilities through the LDF process in this respect – a dialogue has been started with and between the local authorities planning policy staff with regards to the World Heritage Site, and it will be necessary to maintain and expand this as appropriate.

Finally, on a practical note, a decision to create a Buffer Zone would require a submission to the UNESCO World Heritage Committee. There is no evidence to date that a buffer zone would be supported widely by the local population, would improve the current arrangements, or that DCMS would wish to undertake this labour intensive and potentially divisive task.

In light of this, and the comments in response to the draft plan, the following changes were agreed by the Steering Group:

- C2 i) In Chapter 3, explain more clearly the approach to protection of the Site’s setting and buffer zone arrangements, including reference to the new Call-in regulations in respect of World Heritage Sites.**
- C2 ii) Our opinion is that the combination of Policies 1.4, 1.5 and 1.25 and their Actions is sufficiently robust, so they should remain unchanged. But some of the ways these policies are delivered could be strengthened by:**
 - **Maintain and increase dialogue with Local Planning Authority personnel, English Heritage, Natural England and AONBs with respect to developments in the Site and Setting, which is of particular importance whilst LDFs are still being developed**
 - **Come to a clear position on how to respond to developments in the setting of the World Heritage Site, with and for the above named partners**
 - **Highlight the lack of AONB / Heritage Coast protection on Portland within the Weymouth and Portland LDF**

C. Conservation and enhancement of the setting

A very wide range of comments can be grouped under this broad heading, and include: concern about the impact of increased visitors on the setting of the Site such as the erosive impacts of users of the National Trail; impacts on the landscape of visitor infrastructure, such as car parks; and a desire for a natural coastal corridor in support of the setting and wildlife interests more widely.

Whilst this is a complex issue, relating to people's behaviour, signage, information and promotion, visitor management, legislation (Marine and Coastal Access Bill), land management and many other factors, enhancing the setting would be a positive move for the World Heritage Site.

Comments on the setting mainly related to the landscape, so improving this, either through "undergrounding of power lines and BT wires that are intrusive to the seascape and therefore views along the Site" or "Relocating infrastructure away from the site, e.g. car parks" would have a positive effect. Moreover, "the goal to encourage creation of a natural coastal corridor is not explicit and should be", and if this approach is adopted, it would not only improve the landscape, but by default, improve opportunities for wildlife. Although the Site is not designated for wildlife, approaches to improve wildlife would "support the Management Plan policies of protecting the landscape and natural beauty of the Site and its setting".

There is also the issue of signage, promotion and information. One opinion is that "Reducing visual clutter should also be featured here - e.g. signs, lines etc - as this will improve the setting.", whereas others think that there should be more signage so as to tell people where they are, what they should do and be aware of, and so on. There are likely to be many possible solutions to this, all of which be site-specific and strike a balance between use and conservation,

In light of this, and the comments in response to the draft plan, the following changes were agreed by the Steering Group:

- C3i) **Policy 2.12, Change, "Maintain and improve the biodiversity and wildlife value of the Site in ways that are complementary with its OUV" to "Maintain and improve the biodiversity and wildlife value of the Site and setting in ways that are complementary with its OUV, and encourage the coastal corridor to function as a natural corridor as far as possible."**
- C3ii) **Add in a second action under Policy 2.12: "Provide, as needed, management advice to the owners and managers of County Wildlife Sites and County Geological Sites in the immediate setting of the World Heritage Site"**
- C3iii) **With respect to landscape enhancements, change the subheading under Aim 2 from "Enhancements to the presentation of the Site", to "Enhancements to the presentation of the Site and setting".**
- C3iv) **Adjust policy 2.4, from "Improve the presentation and natural beauty of the Site by removing or ameliorating derelict structures and acts of vandalism" to "Improve the presentation and natural beauty of the Site and setting by encouraging the removal or amelioration of derelict structures, acts of vandalism or intrusive infrastructure"**
- C3v) **Add the following Action under Policy 2.4: "Support priorities for landscape enhancements in the setting of the World Heritage Site identified in the Management Plans and delivery plans of the Dorset and East Devon AONBs, and the Coastal Corridor Action Plan"¹**
- C3vi) **Finally with respect to signage and information for users of the Coast Path, actions in Policies 5.5, 5.16 and 5.20 should be amended to reflect the following points, most of which will already be within the Coastal Corridor Action Plan:**
 - **Guidance** for users of the Coast Path, including for groups, should be available online
 - **Signage and information** about the coast path at its access points should indicate the sensitivity of the wildlife and landscape in that section, but in general, signage in the landscape is not encouraged
 - **Effective research** (e.g. with remote people counters) should be used to provide the evidence to support the information provided
 - **The SWCP National Trail Officer** should be invited to join the World Heritage Steering Group (subject to the completion of the review of governance arrangements).

D. Coastal defences

The case for the World Heritage Site's inscription is based on a premise of a naturally eroding coastline. This is well documented elsewhere, including in the draft Plan, which does not characterise coastal defences as 'right or wrong', rather it argues that the best way to protect the Site's OUV is by allowing the natural processes which created it to continue. The Site's boundary covers areas for the most part where there is no built development, or not likely to be built development that would require coastal defences; known as undeveloped coastline. It excludes the gateway town frontages, but it is at the interface of these with the undeveloped coastline where there are likely to be conflicts.

A number of comments from consultees raised issues about this, mainly in relation the protection of property. This was particularly strong from residents of Sidmouth where the cliffs at Pennington Point are eroding at a significant rate, eating away into the gardens of the properties above, thus bringing the issue to the forefront of public consciousness. Other comments varied from those that misunderstood the concept to those very supportive of the premise of the WHS designation.

A further factor to be considered is the influence of the Shoreline Management Plans. Ultimately, once these have been agreed by the Locals Authorities and signed off by DEFRA, they will define the management policy for the different areas of coast. The SMPs will propose one of four management policies with regards to the need for coastal defences or not. These are: no active intervention; hold the line; advance the line; managed realignment. The World Heritage Site team is closely involved in the development of both SMPs that affect the Site, so feel confident that the values of the Site are being considered, and DEFRA's guidance for SMP's is to work with natural processes, be more sustainable and look at the longer term, all of which overall reflect the values of the WHS.

Nevertheless, it is important that the Steering Group recognises that there may be circumstances where a policy in the SMP recommends hold the line where it would be against the interests of the World Heritage Site. In some cases there may be a need to be pragmatic, and so if the scheme passes the three tests below, the aim will be to minimise the negative impacts on the WHS, as outlined in Policy 1.3. In other cases, there may be a need to object strongly and ensure the planning system has all the information required to make the final decision. It should be noted that these cases are very few, and would affect only a small proportion of the 95 miles of the WHS.

So with all areas in the SMP where there is a proposal to hold the line, and there is an indication from the Local Authority that new defence schemes are needed, or old ones are to be maintained or repaired, there are clear tests that the scheme must pass before decisions are made. The tests can be summarised such that schemes must be:

- A. **Environmentally acceptable:** natural processes should not be disrupted except where life or important man-made or natural assets are at risk;
- B. **Technically viable:** a range of options should be considered and schemes should be sustainable and work with natural processes as far as possible;
- C. **Economically viable:** the benefits of defending must be at least equal to the costs.

In light of this, and the comments in response to the draft plan, the following changes were agreed by the Steering Group:

- C4i) **Revise section 4.2 to provide a better explanation of the role of natural processes, the leading function of the Shoreline Management Plans, and the inclusion and explanation of the three 'tests' described above that have to be taken into account before decisions are made. The role of Planning Policy Statement 9 (PPS) regarding Biodiversity and Geological Conservation will also be discussed, as will the need for Planning Authorities to ensure policies for the 'undeveloped coast' reflect the interest of the World Heritage Site and setting.**
- C4ii) **That Policies 1.2 and 1.3 are unchanged, but that 1.2 is given a clear reference to the explanation given in section 4.2 about the Role of SMPs and the tests described above.**
- C4iii) **Adjust the first action under policy 1.2 from "*Reflect the OUV and sensitivities of the Site in Local Development Framework documents*" to "*Reflect the OUV and sensitivities of the Site in Local Development Frameworks and the Shoreline Management Plans that affect the Site*"**

E. Access and capacity issues in small coastal gateways

This issue, raised in detail by a number of consultees, is one that has challenged the management of the World Heritage Site for the last eight years. The basic premise of the comments is that the World Heritage Site designation has increased visitors to some of the very small communities along the coast (consultees specifically identified Seatown and Worth Matravers), putting increased pressure on those communities, causing problems such as significant traffic congestion, difficulties with access for emergency vehicles, inflated house prices and reduced quality of life of the residents. They further suggest that the increased visitors will have a direct negative impact on the World Heritage Site itself at these locations. The specific problems raised vary from place to place and will not be detailed here, but some of the comments specifically request a 'capacity' or 'carrying capacity' study in order to help with management of visitors.

A selection of the comments include:

"Protection and management for the future of some areas of the WHS are inadequate. Small WHS access points need plans suited to their infrastructure and size.";

"the vision needs to recognise that growth in visitors and use of the site is a short term objective up to the limits of capacity, for some of the main gateways, and needs to be restricted and managed for those parts of the site already at capacity."

"There is a distinct difference between use of the site for science and education, which is desirable provided low-volume, high-quality, and its use for public enjoyment, which is highly undesirable if high volume, low-quality, and leads to pressure on limited capacity. Public enjoyment should be dealt with separately."

There are some important points of context in which these comments must be considered

- The 2008 study into the Economic, Social and Cultural Impacts of the Jurassic Coast World Heritage Site designation shows that the increased publicity that the designation has brought does seem to have encouraged more people to visit there area, whether specifically for the World Heritage Site or other reasons. The evidence, based on interviews, data analysis and questionnaires doesn't go into the level of detail of individual communities, but does indicate that the increase seems to be largely during the shoulder, or off-peak, months.
- On the other hand, survey figures from here and other WH Sites show that in general 'World Heritage' is only a small part of the *main motivation* for people to visit a place. Primary factors affecting the decision to visit include a desire to be in a stunning natural environment, the weather, an enjoyable previous visit, and the time of year.
- Thirdly, there is sometimes a perception that more people equals more damage to the Site, but there is no evidence to justify this perception. The World Heritage Site boundary is from the top of the cliffs to the low water mark and the majority of people steer clear of the cliffs, recognising that they are dangerous and inaccessible. Visitor Centres, signage and the seasonal fossil warden help reinforce this message. The physical Site (particularly beaches) is robust, and although specific behavioural issues, such as digging in the cliffs or ledges, need to be addressed, the OUV of the Site is unlikely to be affected. If there is any significant negative impact, it is most likely on the *setting*, the infrastructure, such as the Coast Path, the local services' ability to cope, and on people's perception of the Site. The issues of concern are extremely important and many are addressed in this and other relevant plans as actions to be undertaken in partnership with landowners, the AONBs, Natural England and the National Trust. However it should be recognised that the issues are unlikely to affect the Site's actual OUV.

So, the draft Plan should recognise that there are clearly, on certain occasions and times of year, problems faced by some small coastal communities with open and freely accessible public vehicular access. These problems (already summarised in the first paragraph) are not by any means *wholly* because of the WHS designation, although as mentioned above, the WHS will have played a part. Other factors to be taken into account, in addition to those already discussed, include the general trends in increased car use and leisure time. It is also worth noting that there can be a positive side to these problems; one Parish Council observed that it makes a significant sum of money from its car park to put into local projects and services. In addition, local businesses can benefit and thus provide more local employment.

With regards to the issue of 'capacity', 'tourism carrying capacity' is a catch-all phrase for a set of approaches to managing visitors in protected areas which evolved out of the fields of wildlife and range management; it was created to determine the largest population of a particularly species of animal that could be supported by a habitat over a long period of time. Definitions of tourism carrying capacity include: "the level of human activity an area can accommodate without the area deteriorating, the resident community being adversely affected or the quality of visitors experience declining"³, which is why it is understandable that residents who feel they have a problem might wish for a 'Carrying Capacity' study to be undertaken. UNESCO still refer to this concept in their Operational Guidelines for the management of World Heritage Sites, despite the fact that one of their own publications has pointed out that it is can be a misleading concept⁴. Although as a concept it is now not widely used, UNESCO does request that Sites "describe the 'carrying capacity' of the property" thus indicating that it may still have some relevance for World Heritage Sites that are contained and controlled areas:".

The Jurassic Coast World Heritage Team, with the Dorset AONB and Purbeck District Council, have attempted this exercise through a trial study in Purbeck in 2006. Unfortunately, the outcomes were inconclusive and widely disagreed with. There are a number of difficulties with such a study, but the primary one is because to use the concept properly would depend on ingress and egress into the study area being controlled, which is not the case for this WHS; all of the Site (except the MOD Ranges which has restricted Right of Way access, and the private roads leading to the car parks at Kimmeridge and Ringstead) is accessible through public road or RoW.

Moreover, in order to be of value, any study of this type would need a very clear idea of the research questions, and what needs to be measured in order to answer these questions. The comments indicate a problem with 'capacity', but is that in relation to traffic, parking, numbers of people, a combination of these factors, or something else? There is also the need to consider impacts. Emotional, social or cultural impact, for example, often comes down to perception, which is very relevant to issues of carrying capacity; what may seem like a heavily congested stretch of road to one person, may be regarded as free flowing traffic to someone who has escaped a busy city for the weekend. Prior to commissioning any research, the specific problems would need to be clearly identified and relevant research questions formulated

Although the comments cover a wide range of issues, this draft Plan highlights a range of policies and actions which are already designed to help these issues. Policies in Aim 5 and 6.4 particularly support public transport and walking, and support for visitor facilities at key gateways. The approaches to sustainable tourism in Aims 5 and 6 are very much focused on getting people out of their cars. Support for the Coastal Corridor Action Plan will also have positive implications for the visitor management at all such locations. However, if the main issues are in fact around car use, enforcement of parking restrictions and traffic control, then they are outside the direct scope of this Plan and must primarily be addressed by partners such as the highway and local authorities, landowners and others.

In light of this, and the comments in response to the draft plan, the following changes were agreed by the Steering Group:

- C5i) An additional Issue section is written for chapter 4 that explains the problems faced by some communities, the possible role of the WHS designation in contributing to them, and how this Plan might be used to help address them or influence those who need to play a role in addressing them. This section should also describe the issue of carrying capacity.**
- C6ii) The first action under Policy 5.1 will identify and discuss the issues raised here and will be prioritised, including the decision as to whether individual 'mini-visitor management plans' need to be made for access points that face problems of the type described here, or whether this is best achieved through the Parish planning process. Actions that are achievable and identifiable and relevant will be integrated into the Coastal Corridor Action Plan.**
- C5iii) Add the following action under policy 5.20: "Agree a definitive policy statement with respect to the issue of measuring Carrying Capacity along the World Heritage Site", to be commissioned by and the responsibility of the Steering Group. Ensure that this links to the appropriate policies in the Dorset and East Devon AONB Management plans.**

³ Middleton and Hawkins Chamberlain (1997)

⁴ Pedersen A, Managing tourism at world heritage sites, UNESCO, Paris (2002)

- C6iv) Ensure that the problems faced by some small coastal communities are addressed within relevant Policies and Actions in aims 5 and 6. To make specific reference to individual locations would be too much detail and would be inappropriate without undertaking a coast-wide survey, as would need to be done under Policy 5.1.**
- C5v) Add a new policy under Aim 7, Responsible promotion, that says, “Encourage, and where possible ensure, that promotion of access to the World Heritage Site is sensitive to the different needs of, and pressures on the varying coastal communities”. With an action that relates to the work to be undertaken under Policy 5.1**

F. Landowner involvement

There were many references amongst the consultation responses to the actual or potential roles and responsibilities of landowners. In particular, this was referenced in respect of safety, access, coastal defences, fossil collecting, conservation, landscape enhancements, marine litter and Site Management. Respondee did not present these as actual issues, more pointed out that without the full involvement of those who own the Site, these may become problems.

Landowners are represented on the Steering Group through CLA representatives from Dorset and East Devon, and through the Local Authorities, the MoD and the National Trust. However, apart from with individual estates or holdings, such as Lulworth or the National Trust, the latter with over a third of WHS, there is currently relatively little contact with the owners of the Site.

In light of this, and the comments in response to the draft plan, the following changes were agreed by the Steering Group:

- C6i) In general terms, highlight the role of landowners in Chapter 3.1 and as ‘organisations responsible for delivery of policy’ in relevant Policies such as 1.2 – 1.5, 1.23, 1.24, 2.1, 2.3, and so on.**
- C6ii) In specific terms, and in response to input received, it is recommended that the very active role played by the National Trust in Site protection, conservation, access, visitor welcome and awareness is highlighted more clearly throughout the appropriate policies and actions.**
- C6iii) Be more proactive in terms of links with and communications to landowners, particularly with regards issues such as planning legislation, marine litter, fossil collecting etc. So, under Policy 7.12, adjust the action “Maintain a functional contacts database and disseminate annual review to key stakeholders (e.g. landowners)” to “Maintain a functional contacts database to disseminate information to key stakeholders, and ensure landowners receive dedicated communications about issues facing the site”.**

G. Community involvement

A significant number of respoondees raised the issue of community involvement. The consensus amongst these individuals and organisations is that currently, there is not enough, and the whole process of management and stakeholder involvement is too top down. For example: *“In practice, although local communities have been encouraged to support the nomination, to promote the brand, and to take up opportunities arising from the designation, they have not been involved in decisions about the management of the site and its setting”.*

Other comments suggest that the Communities Forum does not act as an effective mouthpiece for the coastal communities, that small communities and Parish Councils are excluded from the whole process (and that this is contrary to UNESCO expectations), and that there is a need for wider and more diverse community involvement. Overall, the general indications are that communications and engagement could be done better.

To clarify the current situation, a reasonable amount of work is done to engage local communities. All Coastal Parish and Town Councils are invited to the Communities Forum which meets three times a year, and to the Annual Seminar in December. The Communities Forum Chair has a seat on the World Heritage Steering Group, giving any views raised at those meetings a ‘direct line’ to the Management. With 40 Town and Parish Councils, it would not be practical to invite them to sit on an already large Steering Group. Also, rather than inviting a representative Town or Parish Council, or the

Dorset or Devon Association of Parish and Town Councils, which have narrower and wider remits respectively, the Steering Group has always sought representation through the Communities Forum.

In addition, the Jurassic Coast Team works closely with a wide range of community groups or representative organisations along the coast to help them realise their aims with respect to how they can benefit from the World Heritage Site designation, particularly in terms of interpretation and education. This is very much a bottom-up approach and is responsive to community needs wherever possible. Where the Team is not able to support, it acts as a broker to determine who is best able to help with the community's issues.

However, we recognise that the generally positive view of the WHS is not shared by every coastal community, and communication and engagement with communities is far from perfect. The Communities Forum, whilst effective in some ways, and with an outstandingly committed core of individuals who attend to represent their communities interests, has not been able to reach the full breadth of the coastal community, neither geographically nor socially. Nor, being realistic, will it every be able to do this fully, especially as, on a practical front, distance and scheduling will always be a problem for some people. In as much as these comments reflect concern about a 'democratic deficit' in management of the Site, the recent review of governance arrangements saw the Steering Group accept a number of recommendations to improve the involvement of local authority elected members in decisions about Site management.

In light of this, and the comments in response to the draft plan, the following changes were agreed by the Steering Group:

- C7i) Improve the Community Forum's ability to effectively represent the Coastal Parish and Town Councils. This might involve a review of the function, location, scheduling, membership (including the APTCs) and means of communication for the group, as well as the opportunities that it has to feed back issues to the Steering Group. Explore whether these meetings might involve wider public invitation or representation. This will be reflected in brief in Chapter 6 of the Plan.**
- C7ii) Prioritise the first three actions under Policy 4.4, particularly with respect to a Jurassic Coast community champions scheme. No change to the Plan.**
- C7iii) Improve communications to Parish and Town Councils, and to other community groups representing a wider diverse range of interests. So change Policy 7.12 from "Enable the general public, stakeholders, landowners and other partners to be kept up to date with news about the WHS through a variety of means, and targeting a very wide range of audiences" to "Enable Steering Group partners, Parish and Town Councils, landowners, the general public, business groups and other stakeholders to be kept up to date with news about the WHS through a variety of means, and targeting a very wide range of audiences".**
- C7iv) Change the fourth action under Policy 7.12 from "Communicate how the Site is managed for the wider public" to "Communicate how the Site is managed to the wider public and establish a clear mechanism for feedback, questions and requests for support".**

H. Conservation and management of geology and fossil collecting

The consultation elicited a relatively small number of comments about this area of management. For the purpose of this report we have categorised these into fossil collecting and geological management.

Fossil collecting raises strong but often polarised opinions in people, both from the geological community and the lay public. This report aims simply to respond to comments raised, such as:

"I completely disagree with the statement in 4.2: "...the creation of artificial structures along the coast that would affect the natural process of erosion or obscure the exposed geology, and lead to a loss of fossils." Suitable artificial structure, such as non-destructive sea defences, would preserve the site, NOT lead to the loss of fossils. The activities of fossil collectors destroy the natural setting of fossils for others to see. They also interfere with the natural process of destruction of the coastline through sea erosion. It is this approach to Protection and Management which is inconsistent with the OUV, not the construction of suitable non-destructive coastal defences."

One misconception of the OUV of the World Heritage Site raised here is that the Site is not preserved by 'protecting' the cliffs through stopping erosion. In fact its OUV relies on it eroding naturally, thus maintaining exposed (as opposed to covered by vegetation) cliffs and releasing fossils through natural cliff falls and landslides. Once out of the cliffs (ex-situ), the fossils may be either found by scientists, fossil collectors or other interested people, or destroyed by the natural erosion of the sea. Sea defences stop the natural processes of erosion, and would lead the cliffs to become vegetated and the exposures and source of fossils would be hidden from view.

Other relevant comments include: *"The vast majority of fossil collectors whilst collecting insitu do not record or attribute the fossil find to any particular horizon and therefore the find is scientifically valueless. However for fossil hunters to utilise material that has been eroded from the coastline via slumping, landslips etc in itself can be very useful due the amount of material which could very easily and quickly be carried out and redeposited in deeper waters. However again these erosional features are by their nature very unstable and hazardous, particularly where undercutting of the cliff has taken place and thus rendering the overhang unstable. Fossil hunting needs to be more tightly constrained."*

Fossils in-situ should only be allowed to be extracted with permission from the landowner. Permission for research-based collecting of in-situ material can be sought at any time and the Steering Group would positively welcome that if it is furthering the scientific understanding of the WHS. Fossil collectors extraction of in-situ fossils is rare, as most are recovered from ex-situ material. However, when undertaken, it is normally done, again, with permission of the Landowner. It is worth noting that the National Trust has recently taken legal actions against one collector consistently digging in the cliffs on their land. Having a code of conduct means that the Site Management team and scientific community get to know what specimens of scientific importance are coming out of the cliffs and are available for the museums to acquire or researchers to study.

Finally, in response to the comments, the degree to which a fast eroding coastline can be 'decimated' by fossil collectors is questionable. Research at Charmouth by Bournemouth University is starting to show that the impact of any digging is tiny in comparison to the natural erosional processes.

A further two comments on this issue read:

"In line with the suggestion that more emphasis should be placed on conservation, the WHS team might investigate additional means of ensuring that there is widespread understanding of what constitutes responsible collecting (and, similarly, an understanding of the threats presented by irresponsible collecting) to avoid any unintended harm to the site (or, indeed, risk to those involved)." and; "There needs to be greater integration between visitor management and conservation objectives; for example the Fossil Warden has been a good initiative."

These highlight potential conflicts between geological and visitor management in some areas of the coast. Because of the nature of some parts of the coast, such as Charmouth, the two concepts are compatible, with initiatives like the fossil warden help that to happen, and reduce the actual and perceived impacts of irresponsible fossil collecting. For other

parts where the fossil resource and nature of the cliffs is different, there is more likely to be conflict and different approaches are needed. There are occasional examples of irresponsible collecting that remain an ongoing challenge,

One final comment referred to the overall approach to geological management:

"A review of the geological management of the Dorset and East Devon World Heritage site is required, to reflect broader national and international principles and practice in geoconservation. Issues include commercialisation of palaeontological heritage, management plans, zoning of conservation requirements, enforcement of conservation legislation, establishment of a representative scientific advisory group and a scientifically informed revision of the existing fossil collecting code."

This stands alone in the consultation, so although the amount of weight that can therefore be given to it is limited, a response is necessary as it comes from a senior figure in European Geoconservation. Moreover, the geological management of the Dorset and East Devon Coast as a naturally eroding sea-cliff exposure site, is in line with Natural England's national policy, and in having been through the rigorous tests in order to become a WHS, has been approved by UNESCO, IUCN, and the JNCC. So the case for such a review is unlikely to find favour with the Steering Group or any of those bodies.

Having said that, no system is perfect and the Steering Group is very open to further suggestions of how the geological management and monitoring might be improved given the specific nature and extent of this eroding coastline and the limited resources available to undertake these tasks, and provided it is backed up with evidence from comparable situations. It is also worth mentioning that the Fossil Code will be reviewed within the lifetime of this Plan, including a review of the criticisms made against the code.

In summary, the Steering Group is aware that a small but vocal minority have criticisms of the approach to management of fossil collecting on this coast; an approach that is largely a pragmatic and realistic response to the actual situation, and that is practical based on existing resources and legislation. Criticisms are sometimes based on perception, and sometimes on evidence, and while the Steering Group should always be open to listening to these responses, the existing approach and policies are in line with National Policy and are considered to be robust.

In light of this, and the comments in response to the draft plan, the following changes were agreed by the Steering Group:

- C8i) Make the following changes in section 4.6: changing the issue title to Geological management; some clearer description of what is meant by responsible collecting and where best practice might be sought; and with a description of what geological conservation and monitoring involves and what it means in practice**
- C8ii) Change the first action in Policy 2.6 from "Review the West Dorset Fossil Collecting Code within the timescale of this plan" to "Undertake an independent review of the West Dorset Fossil Collecting Code, and criticisms of it, within the timescale of this plan"**
- C8iii) Under Policy 2.7, change the action from "Employ a seasonal fossil warden to promote good practice in the Lyme Regis and Charmouth area" to "Continue to Employ a seasonal fossil warden in the Lyme Regis, Charmouth and Seatown areas, and investigate whether a similar arrangement is necessary at other locations, notably Kimmeridge."**

I. LDFs and World Heritage Sites

There were some comments from consultees about whether the Local Development Frameworks, currently being developed, will sufficiently reflect the policies and aspirations of this Plan. Although this was touched on with respect to Buffer Zones above, these comments relate more to the function of the LDFs per-se. It must be noted that although *effectiveness* of LDFs is outside the scope of this plan, the Steering Group and Management Plan have the ability to influence the LDF process.

One consultee reminds us that “*LDFs are required not to repeat issues that are sufficiently covered in national policy, because that national policy is also taken into account in deciding planning applications.*” This is followed by a text suggestion which will be included. The National Policy here is from PPG 15, which will shortly be superseded by the Planning Circular on the protection of World Heritage Sites .

The same consultee further adds: “*Integration with the planning system is recognised in the management plan as an opportunity, and the management plan will inform the preparation of the district’s Local Development Framework. The revised plan has a very clear emphasis on the overarching importance of maintaining the core geological value of the site, which is the reason for its designation. (Section 4.2 and policy aim 1) This is very much welcomed, and is of particular use in guiding and steering the development of local planning policies.*”.

A different comment suggests that “*... it should be noted that there is an opportunity to align planning policies affecting the World Heritage Site with wider planning policies – for example, redevelopment and regeneration of town centres may reduce pressure for development on edge of town sites which may create additional pressure for coastal defences in future.*”.

Finally, a further comment suggests that an action under policy 6.2 regarding the LDFs is too prescriptive and suggests a change to “*partake in LDF process in the four Districts to ensure that emerging policy would permit... etc*”. The implication from this and the other comments is that whilst it would seem the right approach is being taken to integrate the WHS Management into the LDFs, there is still some work to do in order to ensure a consistent approach.

In light of this, and the comments in response to the draft plan, the following change was agreed by the Steering Group:

C9i) No change to policies, but add an action under Policy 1.1, to “Establish regular dialogue with local and regional planning staff, English Heritage, Natural England and the AONBs with respect to planning policy and the World Heritage Site”. This will also support issue A above.

J. Visitor facilities in West Bay

NOTE: Although all other responses are general and Site-wide, this is a very specific comment, and warranted a response because of the number of times it was raised. The principles here would apply equally to communities other than West Bay if they had the same issue.

A significant number of comments were received with regards to the desire for visitor facilities for the Jurassic Coast to be identified for West Bay. Most indicate West Bay’s suitability for such a facility, such as: “*West Bay is quite unique on the Coast being an attractive fishing harbour right next door to amazing gold cliffs. By having no Gateway between Lyme and Chesil Beach how are the sandstone cliffs that stand out all the way to Lyme Regis -on a good day- represented? Surely Bridport and West Bay would be an advantageous gateway to the Jurassic Coast too?*”.

Also typical is “*Bridport/West Bay should be included in the list of towns to be supported for the provision of new or improved visitor/interpretation facilities, and should not be excluded because of the regrettable failure of the West Bay Mound project*”.

The Steering Group is very keen to see appropriate, sustainable and high quality facilities developed along the coast, and will do its best to support them through the individual member organisations and the Jurassic Coast Team. However, it has always been of the opinion that the initiative for these facilities should come from the communities that hope to

create them, normally with the support of the appropriate Local Authority. This has been the case in Exmouth, Seaton, Beer, Lyme Regis, Chesil beach, Weymouth and Swanage, and with varying degrees of progress. This bottom-up approach is further reflected in work with existing Visitor centres, museums, schools and other educational initiatives, and is based on the principle that a facility with a firm basis in the community will have good local ownership and is more likely to thrive long-term. This approach is borne out by many places around the country, and locally, with centres like Charmouth Heritage Coast Centre, Chesil Centre and Durlston Country park.

The original aspiration for Interpretation along the Jurassic Coast is detailed in the Interpretation Action Plan (2005) which drew on a coast-wide consultation about what communities would like to celebrate and interpret World Heritage status. The principal project at West Bay / Bridport was the Mound scheme, which has since failed primarily due to Environment Agency planning objections. Since then, no concrete plans for West Bay have come forward from the broader community, nor from any specific community group or the Town or District Council. Two buildings, The Methodist Chapel (West Bay) and the Literary and Scientific Institute (Bridport) have been mooted as having potential uses in relation to the Jurassic Coast, but until a firm plan is developed by the group that intends to run such a centre, there is nothing to provide support for. If West Bay / Bridport can develop such a plan, and work with the Jurassic Coast Team and Local Authorities to do that, then we would be delighted to see the gap filled and a facility in place to tell the story of West Bay's place along the Jurassic Coast.

In light of this, and the comments in response to the draft plan, the following changes were agreed by the Steering Group:

- C10i) Adjust the wording alongside policy 6.2 to reflect West Bay / Bridport communities' aspirations for a visitor facility**
- C10ii) Highlighted by these comments is the need for an updated Interpretation Action Plan, so onto the end of the wording in the action under policy 6.2 that reads "Undertake a gap analysis for interpretation of the WHS in Gateway Towns", add: "and use this and other information to update the Interpretation Action Plan".**

3. Concluding statement

The level of feedback to the Management Plan revision was reasonably good, although most responses were from organisations or individuals already involved in the WHS in one way or another. It will be important for the next revision to try to seek input from a wider range of people and organisations, and some recommendations for this are below. It is also important that the Steering Group maintains and builds on this process over the lifetime of the plan. As we saw, community involvement was flagged up as a key issue.

With respect to the contents of the plan, the comments from the public have led to some very welcome changes, although none of them significantly affecting policies or aims. By and large therefore, the Steering Group is seen to be broadly on the right track by its constituent partners, and by external organisations. Clearly this report and the schedule indicate that there are a lot of minor amendments to be made. Moreover, the input from the Strategic Environmental Assessment and Equality Impact Assessment are still to be integrated.

4. Ideas for future consultation methodology

This is a list of some suggestions that might be used to make the next review more inclusive, for future record:

- Use an online questionnaire in addition to a paper copy – encourage more people to fill out the questionnaire
- Offer a presentation and / or meeting to all Coastal Town and Parish Councils
- Have a mini-version of the questionnaire in the form of flyer or leaflet with the key questions, space for comments and requests for further information
- Hold a number of public meetings and / or do drop-in sessions, and focus groups with groups representing minority communities and young people

Coordinated and prepared by Jurassic Coast World Heritage Team Leader. For further information please email consult@jurassiccoast.com or call 01305 221000 and ask for the Jurassic Coast Team.