**LIVERPOOL SHOULD HAVE REMAINED A UNESCO WORLD HERITAGE SITE**

**BUT IT REMAINS A GREAT WORLD HERITAGE CITY!**

**UNESCO’s flawed decision is not fatal to Liverpool**

UNESCO’s World Heritage International Committee today agreed to delete Liverpool from the list of World Heritage Sites. This Task Force bitterly regrets that decision. In our judgement deletion will be damaging for Liverpool but even more damaging for the United Kingdom, UNESCO itself and the wider world heritage movement. We believe that the city’s achievements mean Liverpool had a very powerful case to remain designated. We also believe that the arguments UNESCO used as a justification for deletion were unbalanced and misleading.

However,Liverpool has always been a world-class heritage city – with its fine architecture, its world-class waterfront, its cultural assets with the people at its heart - as well as a city of firsts. Liverpool values and cares deeply about its heritage and has made substantial investment in it in recent years. The city has received growing national and international acclaim for its important cultural and heritage offer. We are totally confident that despite the UNESCO decision Liverpool will continue to be leading example of heritage-based development.

**Why was Liverpool deleted?**

The primary reason was the significant redevelopment proposals along the city’s North Shoreline on land that although now developing, has been mainly derelict and inaccessible to the public for many decades. Basically, UNESCO argued that Peel’s outline planning permission for the speculative Liverpool Waters development included too much high-density development with too many high buildings which would destroy the Outstanding Universal Value (OUV) of the World Heritage Site. It also argued that Everton’s recently approved plan to partially fill in the dock at Bramley Moore while building a new football stadium was equally damaging.

Liverpool takes a very different view. The city has always filled in existing docks to allow new development. It has always built tall buildings. Crucially because it has invested substantially in its heritage assets the site is in better condition than when it was designated in 2004. Urban World Heritage sites like Liverpool, are a critical example of the challenge involved in reconciling the inheritance of the past with the needs of tomorrow. Liverpool’s desire to see its outstanding cultural heritage retained as a part of the city’s future must be reconciled with the desperate need for inward investment in the north Liverpool area which has some of the greatest economic and social challenges in the whole UK – indeed Europe. The north docks collapsed when the port declined, leaving the people living in the area marooned in a sea of economic decline. And it missed out on the city’s extraordinary if incomplete renaissance during the past 20 years. This is the heart of the city’s dilemma. Giving those communities and people a brighter future is critically important for the city. It cannot allow World Heritage Site status to seriously constrain its ability to improve the economic prospects of its people. But we believe the city’s experiences and its recent policies demonstrate that economic growth and conservation are and can be mutually supportive not mutually exclusive.

**Why was deletion the wrong decision?**

**Liverpool is not a monument or a museum but a rapidly changing city**

There is always tension between conservation and development in big cities. Other urban World Heritage Sites have caused UNESCO worries since Liverpool was placed on the ‘in danger’ list. UNESCO’s concern since 2012 has been the prospect of tall buildings in the Liverpool Waters – even though none of them have ever been built. But it has treated some other cities differently - not objecting to high rise construction that has already taken place. The Tower of London World Heritage Site, for example, has been surrounded by some of the tallest new buildings in Europe, which have dramatically changed its historic setting. But UNESCO has not threatened to delete London!

Also, unlike other World Heritage cities Liverpool has a long history of restructuring its docks, building tall structures and infilling docks to accommodate new development. The massive Royal Liver Building, with its iconic Liver Birds – the worldwide symbol of the city – was built on an infilled former dock site. As the Merseyside Civic Society has argued, in Liverpool, big buildings, tall buildings and dock in-filling are simply part of a long standing architectural and building tradition.

**The Liverpool site is different**

In addition, Liverpool, unlike many other World Heritage cities, has a World Heritage Site and Buffer Zone which includes the whole of the city centre, the central waterfront area and most of the derelict northern docks. Arguably the area is much too big. It is hugely challenging to apply the strict operational and essentially preservationist guidelines of UNESCO. Also, UNESCO is worried about only one sixth of the whole WHS. It does not have a problem with the rest of the area which covers much of the city centre. As World Heritage UK - which represents the interests of all the UK’s World Heritage Sites - has pointed out, it is important to distinguish between the derelict north docks and the rest of Liverpool’s World Heritage Site. This much larger area includes the ‘Three Graces’, Pier Head and Albert Dock Waterfront, Ropewalks, the Cultural Quarter, Liverpool One, the Town Hall and the Castle Street areas. World Heritage UK’s considered judgement is ‘*In these areas, which have the greatest inheritance of superb 19th century and early 20th century architecture and townscape, high standards of planning and heritage conservation have been upheld.’*

**Liverpool has massively invested in heritage across the whole city**

Crucially because Liverpool has spent £740m on its heritage assets and has £350m in progress the condition of the site has improved since 2004. This has involved the complete reconstruction of the city centre and public realm; exciting modern buildings at the Pier Head to which UNESCO did not object; the award-winning Liverpool One retail scheme; saving and opening the underground remains of the world’s first enclosed wet dock; the restoration of the historic Stanley Dock. Many other schemes have brought back into use great historic buildings for hotels, housing, office space and cultural destinations. These include major projects at India Buildings, St Georges Hall, the Bluecoat, Central Library, Prudential Building, Cunard Building, the Royal Liver Building, and innumerable smaller restoration projects. Across the city only 2.5% of historic buildings are now in serious disrepair. In 2000 it was 13%! We argue this is a triumph of heritage-led city regeneration.

**Liverpool is investing in north Liverpool’s heritage – Everton’s stadium at Bramley Moore dock would help enormously**

There is also a huge amount of good heritage work already taking place in the north docks. The developments at Stanley Dock including the restoration of the colossal brick Tobacco Warehouse which stood decaying for 60 years, the incomparable Titanic Hotel and the Ten Streets projects demonstrate how heritage can be conserved but modernised and brought into economic use. The planned Everton stadium project at Bramley Moore dock would be the biggest development Liverpool will see in the next decade. The dock itself has been derelict and cut off from the city by a high wall for 60 years. It is a desolate former coal yard sitting next to a major sewage treatment plant at the absolute extremity of the site.

A new football stadium would conserve not damage the existing Bramley Moore dock and would provide an opportunity for interpretation of the site and Liverpool’s role in the slave trade. The project is huge – on the same scale as the European Commission’s Objective 1 Programme and Grosvenor Estate’s investment in Liverpool One which both helped transform the city in the past 20 years. It would be a crucial piece of the city’s overall future economic jigsaw linking north Liverpool back to the city centre and transforming the waterfront. Everton’s £500m investment would be part of a larger £1.3 billion boost to the local economy. It would create 15,000 local jobs; attract 1.4m visitors a year; provide £32m in income for local families; generate £2.2m Council Taxes and £1.7m in Business Rates for the city council and contribute £237m of social value. Specifically, it would invest over £50m to protect the dock’s heritage assets which are now simply rusting away. The stadium design is potentially the greenest, most accessible in the UK. Over 60,000 people were consulted on the plan and gave it 95% approval. The club has an extraordinary record of supporting its local community through Everton in the Community and plans to make Goodison Park which it will be leaving a genuine community asset. The UK Government itself has decided not to ‘call in’ the decision which suggests that it believes if building the stadium led to deletion, the economic benefits outweigh any costs.

**Liverpool’s plans and ambitions different in 2021 than in 2011 when UNESCO first objected**

In recent years Liverpool worked hard to persuade UNESCO of their good intent. It is now completing – although delayed first by austerity cuts and now COVID – its Local Plan for the whole area and a policy on tall buildings which clarifies its intentions for the city centre. The Mayor’s World Heritage Site Task Force helped produce *The* *North Shore Vision* in 2020 - the first comprehensive plan for the sustainable development of the whole area that applies the United Nation’s Sustainable Development Goals and adopts the UNESCO Historic Urban Landscapes (HUL) guidelines. Liverpool for the first time now has a coherent vision and plan for the whole of the North Shore which includes much of the World Heritage Site. This is an international exemplar of heritage-led regeneration which aims to deliver high quality renewal and economic growth in a collaborative way by harnessing the embedded value of the North Shore neighbourhood. It will bring together heritage and urban development does not treat them as conflicting objectives. This is particularly crucial in the north docks area, where redundant buildings and spaces which have lost their original economic purpose are simply a derelict townscape, contributing little to the socio-economic or cultural life of the city when they could be the first part of the city’s post-COVID development. The Task Force has also just produced it stocktake *‘Liverpool: A World Heritage City’* which supports the city’s case that Liverpool takes its heritage seriously; has invested substantially in it; and has successfully balanced the need to protect its heritage with the need to deliver economic prosperity to the very many, still very deprived areas of the city.

Crucially also, Peel’s development plans have changed radically from the original ones to which UNESCO objected. None of the high-rise buildings proposed in the original planning application has ever been built. Their revised plans for Liverpool Waters are more place sensitive, more sustainable, greener with much lower densities, fewer tall buildings and on a more human scale. In fact, the only new tall building constructed on the waterfront since the designation of the WHS is the Lexington Tower on Princes Dock. That was dealt with as a stand-alone planning application outside the scope of the outline permission for Liverpool Waters and sits on the site of a pre-existing permission for a similar height tower that had expired. There was no objection from Historic England to it. The building reads as part of the 1960s and 1970s office expansion zone, which is full of existing tall buildings. Because of the topography it reads as lower than the nearby, existing Beetham Tower.

**What is the problem with UNESCO’s case?**

Set against this overall achievement, we believe UNESCO’s judgment was unbalanced, treated Liverpool unfairly in relation to other World Heritage cities and failed to consider Liverpool’s unique urban history of development, its ethos, and characteristics. In fact, it treated Liverpool, its city centre, and its waterfront, as though it were a monument or a museum, not a living and evolving city.

UNESCO takes a very different view of the future of the economic and social development of Liverpool than many of its leaders. There are two competing visions of what Liverpool should do and be in the next 20 years. That difference was a primary cause of the disagreement. But UNESCO in its report to the WHS Committee also made a series of specific technical arguments to defend its case for deletion. Liverpool disagrees with several of those arguments. The most important differences are the following. They fatally weaken UNESCO’s decision in our view.

***UNESCO argued no new developments should take place in the WHS***

The UNESCO report argued that in 2016 it requested the State Party (UK government) to ensure that only repair and reuse of historic buildings, maintenance works, and small-scale projects should receive permission within the rest of the property until Desired State of Conservation Report was finalised and adopted. UNESCO reports that the UK government advised that such a request is neither necessary nor legally feasible and it has continued to permit new constructions that have negatively impacted the attributes which contribute to the OUV of the property.

Liverpool by contrast argued the moratorium that UNESCO was asking for was simply not legally enforceable under UK planning law. Neither the government nor the city could impose such a moratorium.

The report gave no details of the *‘new constructions that have negatively impacted the attributes which contribute to the OUV of the property’.* In fact, all new buildings constructed so far within the Liverpool Waters have not been objected to by Historic England and have been accompanied by Heritage Assessments which comply with the requirements of the UNESCO’s advisers ICOMOS.

The planning permissions which caused UNESCO concern have not so far been implemented. And as already seen, the only new tall building constructed in the north docks is the Lexington Tower at Princes Dock to which Historic England did not object. It is 30 metres lower than nearby existing tall buildings in the 1970s office expansion zone. It obtained permission for a pre-existing consent to the Liverpool Waters planning permission.

***UNESCO said there has been development without a strategic vison***

The UNESCO report argued that that the implementation of the Liverpool Waters scheme had started with the granting of planning permission for individual buildings without a strategic vision anchored in regulatory frameworks has continued until the present.

But this is not technically accurate. The S96A approval and that of both the Princes Dock and Central Docks Neighbourhood Masterplans set out a clear strategic vision for the entire Liverpool Waters project. All standalone planning applications within Princes Dock and Central Docks have included a Liverpool Waters Conformity Statement to show how the development does not impact the wider deliverability of the Liverpool Waters Outline Consent.

***UNESCO argued there have been changes in masterplans without consultation***

UNESCO argued that the submission of Princes Dock Masterplan and changes to the ‘Liverpool Waters’ scheme had not been submitted to the Secretariat and the Advisory Bodies for review and comments before their adoption by the LCC. It argued these documents put forward plans which do not ensure the adequate mitigation of the potential threats to the OUV.

Again, this is not accurate. The World Heritage Centre, its advisers and the Committee were invited to comment on both the Princes Dock Neighbourhood Masterplan and the Section 96A application. But no formal comments were received. Also, UNESCO were invited by Peel L&P, via UK government, to collaborate in the interrogation of the overall Liverpool Waters masterplan and the preparation of the Central Docks Neighbourhood Masterplan in May 2018. But UNESCO never responded to the invitation.

***UNESCO objected to the proposed Everton football stadium at Bramley Moore Dock***

UNESCO objected to the proposed football stadium on the site of Bramley Moore Dock. It noted that it would require infill of the historic dock, and construction of a very large new built form on the Liverpool waterfront. It argued that its advisers ICOMOS insist that the proposal, if implemented, would have a completely unacceptable major adverse impact on the authenticity and integrity and the OUV of the property. It argued that the development should not proceed at this location because it is contrary to the UK government’s own guidance documents and contrary to explicit decisions of the World Heritage Committee. It argued that the North Shore Vision for this part of Liverpool did not address these issues because its focus was not on protecting OUV but rather on outlining an integrated development approach for an area of the city that needs social and economic realignment.

However, we would argue that the North Shore Vision was produced entirely on the basis of the process and objectives set out in the UNESCO Historic Urban Landscapes Guidance and that it does focus on the protection and interpretation of OUV. We believe the document is a valuable and credible attempt to harmonise an historic urban environment with gradual regeneration and social and economic growth.

Given the proposed reduction in building heights, scale and mass outlined in the revised plans for Liverpool Waters, it is difficult to understand precisely what was *‘completely unacceptable’* in the Bramley Moore Dock proposal. The relevant policy is Liverpool WHS Spatial Planning Document which was agreed by all parties including Historic England and says that the permanent infilling of water space should be resisted - unless the circumstance was exceptional. Plans from Everton Football Club are clearly exceptional as already outlined. It will bring £500 millions of investment of which £50 million will be spent on restoring heritage features on the site. The vast majority of the 60,000 people responding to a public consultation was in favour of the stadium. This has been approved and not called in for scrutiny by the Secretary of State in accordance with local and national planning policy. The Bramley Moore project will not only drive the city economy it will increase the value of the heritage in a crucial part of the city. Liverpool’s current leaders would be betraying their forefathers who endlessly innovated and changed the physical structure of the city to develop its maritime economy and heritage if they simply stopped all desirable development in deference to an international organisation.

**What next? Conserving but developing a World Class Heritage City**

Liverpool is still emerging from an awful pandemic which has had a massive impact upon its crucial city centre economy. The city council itself is also having to develop a huge improvement programme after the recent Caller report. At the same time the pandemic crisis has pulled together all the city’s institutions in a remarkable display of unity on the public health crisis - but also on many other issues including heritage. Critically, the first black woman to lead a major UK city, Joanne Anderson, has been elected as Mayor. She is heavily involved in the critical reassessment of one very difficult part of Liverpool’s heritage – its role in the slave trade. Ironically it was that imperial past and global role – with all its sensitivities and challenges - that got Liverpool the status in the first case. For all these reasons it was the wrong time for UNESCO to delete Liverpool. Crucially UNESCO has not made a full Reactive Monitoring Mission to view the World Heritage Site since 2011. It was extraordinary to take the major decision to delete based on that visit a decade ago!

Also much has changed in Liverpool in the last twelve months. And the city’s leadership is at its most united on this issue since it won Capital of Culture in 2003. Mayor Joanne Anderson wrote to each of the 21 UNESCO Committee Members asking for a deferral on the decision and inviting members to come to the city and see for themselves. A similar letter from the Secretary of State also provided strong support for Liverpool. Most significantly the leaders of the city’s anchor institutions – its 3 universities, major cultural organisations, both football clubs, Bishop and Archbishop, Civic Society, key business organisations, leading cultural figures as well as Lord Heseltine one of the architects of the city’s renaissance – publicly supported the Mayor’s request. This Task Force endorsed that request. Specifically, we endorsed World Heritage UK’s recent measured conclusion:

*‘Liverpool has a long history of building and rebuilding on a large scale on its waterfront. Its World Heritage Site is in much better condition now than when designated, with exemplar heritage led regeneration projects in Stanley Dock, Albert Dock, Liverpool One and elsewhere. The proposed deletion would remove a key element of the UK’s cultural and natural heritage collection of international significance. We strongly support the call from Liverpool City Council and others for UNESCO committee members to visit Liverpool before a final decision is made.’*

We bitterly regret that UNESCO was not willing to accept the good faith invitation from the city’s many leaders. Liverpool did not want to lose WHS status. However, there over 1200 World Heritage Sites. But there is only one Liverpool. People come to it because it is a fascinating, exciting place. They won’t stop coming because the plaque has gone. Also, heritage is not just the buildings that people built. It is also the culture and values of the place they created. They should also determine if its heritage is of world status. The Liverpool debate recently has focussed too much on building heights and not enough on the quality of the place. The city leaders and its people must debate this aspect of its heritage now. But they must make those decisions by and for themselves. We believe that deletion from the list of WHS is an injustice. But we believe even more strongly that Liverpool will remain and flourish as a great, world-class heritage city in future.

**The Mayor’s World Heritage Site Task Force.**

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