

# World Heritage Site Project

## Combined consultation response

Joe Perry, Sam Rose, Steven Andrews, Nov 2022

This document contains the feedback and responses to the two consultations undertaken in respect of the proposed Flow Country World Heritage Site boundary and its draft management plan, in spring and summer of 2022 respectively. It comprises the following four sections:

1. Community Consultation Activities<sup>1</sup> May-Aug 2022: Summary narrative report
2. Commonplace online platform feedback and responses: Table 1
3. Draft Flow Country World Heritage Site Management Plan consultation Jul-Sep 2022: Table 2
4. Frequently Asked Questions about the proposed World Heritage Site

If you have any questions about this report, please contact us at [Steven.Andrews@highland.gov.uk](mailto:Steven.Andrews@highland.gov.uk)

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<sup>1</sup> Including boundary consultation

# Section 1: Community Consultation Activities, May-Aug 2022: narrative report

## Table of Contents

EXECUTIVE SUMMARY .....	4
INTRODUCTION .....	6
CONSULTATION ACTIVITIES FROM MAY 2019 – SEPTEMBER 2019 .....	6
CONSULTATION ACTIVITIES FROM MAY 2022 – AUGUST 2022.....	6
COMMUNICATION AND OUTREACH .....	8
CONCLUSIONS.....	12
NEXT STEPS .....	12

## Executive Summary

The Flow Country Partnership (hereafter referred to as “the Partnership”) carried out extensive community consultation activities between 2018 and 2022. Over this four-year timespan there were two periods of formal consultation activities: the first from May 2019 – September 2019, and the second from May 2022 – August 2022. More informal activities included presentations to interest groups and continued media updates on the progress of the nomination. This report focusses primarily on the second period of formal consultation.

### Consultation Activities from May 2022 - August 2022

Over 16 days in May 2022, the Partnership welcomed 248 visitors to drop-in sessions across Caithness and Sutherland. These sessions were held in town halls, museums, libraries and community centres and were evenly dispersed across the proposed World Heritage Site.

This period of consultation also included three months of online consultation, using the Commonplace platform. From May to August, 2,399 people visited the consultation pages, with 230 leaving a contribution and 124 signing up for our newsletter.

From 18th July 2022 to the 12th September 2022, the Partnership also invited comments on a draft management plan. This element of the consultation was hosted online by The Highland Council.

In the preceding months, representatives of the Partnership raised the profile of the bid regionally, nationally and internationally, through presentations at local meetings, such as deer management groups, and international conferences, such as COP26. The efforts of the Partnership have been amplified by a selection of short stories and poetry about The Flow Country, penned by authors living in the region.

Political engagement during this period has been strong and included a site visit by the then Minister for Scotland Iain Stewart MP. Several parliamentarians have received face-to-face briefings from Partnership representatives and Members have received written and verbal briefings. A ministerial reception in Whitehall was held in November 2022 as part of the “Keep us Covered” campaign and featured contributions from all the major political parties and representatives of The Flow Country Partnership. This event demonstrated the wide cross-party support for the Flow Country World Heritage nomination.

### Response

The response from both periods of consultation revealed strong support for the World Heritage Site bid for The Flow Country. Representatives of the Partnership at drop-in events recorded positive responses from 80% of attendees, while 74% of responses through our online platform were supportive. Those in support of the bid expressed their hopes for increased local investment, building a sustainable tourism economy, increased attention to and care of the peatland habitat and a sense that World Heritage Site status would “put the region on the map”, while concerns included potential restrictions on land use and over-tourism.

### Next Steps

In early 2020, The Flow Country was announced as the United Kingdom’s candidate site for World Heritage Site status by the UK Government Department for Digital, Culture, Media and Sport (DCMS). The next stage of the process has been to prepare a full nomination to UNESCO, which will be submitted in early 2023.

It is often said that World Heritage Sites enjoy those benefits which they prepare for. It is the responsibility of The Flow Country Partnership to reflect on the results of these consultation activities and plan for a World Heritage Site that brings multiple benefits to local communities. The Partnership will continue to host consultation events and inform residents, landowners and other interested parties of important progress via its website and through the communication channels of all partner organisations.

*"These incredible peatlands are so special. Not only is the area spectacularly beautiful, carbon is trapped here naturally, making it vital in our fight against climate change."*

*"This unique ecosystem, enjoyed by the UK's rarest wildlife, should be celebrated. Gaining UNESCO World Heritage status would be particularly fitting for this amazing landscape and also help level up the area, encouraging sustainable tourism and supporting local green jobs."*



Figure 1: Ministerial visit from Iain Stewart MP (second from left), UK Government Minister for Scotland, Forsinard, 9th June 2022.

## Introduction

The Flow Country World Heritage Site Working Group was established in 2017, under the auspices of the Flow Country Partnership<sup>2</sup>, to put forward The Flow Country as a candidate for World Heritage Site status. The Working Group consisted of representatives from: NatureScot, The Highland Council, Wildland Ltd., The Environmental Research Institute (University of Highlands and Islands), Royal Society for the Protection of Birds (RSPB) Scotland, Scottish Land and Estates, Highland Third Sector Interface, Highlands and Islands Enterprise, Visit Scotland, Federation of Small Businesses and Confederation of Forest Industries.

## Consultation Activities from May 2019 – September 2019

From May 2019 to September 2019, the Partnership held a series of consultation events to gauge community support for the concept of a Flow Country World Heritage Site. This included face-to-face interactions with 1,354 residents of Caithness and Sutherland and reached many thousands more through local media. This intense period of consultation was preceded by a range of home visits, displays at agricultural shows, community council meetings and other public events to raise awareness of and support for the World Heritage Site bid. The consultation also reached a wider UK audience, through events in Royal Botanical Garden Edinburgh and enthusiastic coverage in national press.

This period of consultation featured high-level political engagement, including a Scottish Parliamentary event at Holyrood and a site visit by the then Minister for Rural Affairs and the Natural Environment Mairi Gougeon MSP. In July 2019, the Partnership also hosted a series of public talks featuring high profile BBC presenters, world heritage professionals and local peatland experts.

## Consultation Activities from May 2022 – August 2022

A community consultation focused on the proposed boundary of a Flow Country World Heritage Site was carried out from May – August 2022 by The Flow Country Partnership. The consultation was delivered in a hybrid format, combining 16 drop-in sessions with an online consultation using the Commonplace platform.

### Aims of the 2022 Consultation

The aims of the second stage of community consultation, May-August 2022, included:

- To gather feedback from local communities, in particular:
  - o Their level of support for the bid
  - o Their opinions on the proposed World Heritage Site boundary
  - o Their hopes and concerns regarding World Heritage Site status for The Flow Country
- To give people the opportunity to speak to representatives of The Flow Country Partnership and ask questions about our work.
- To encourage people to record their thoughts and opinions on the Commonplace consultation platform.

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<sup>2</sup> Then called the Peatlands Partnership

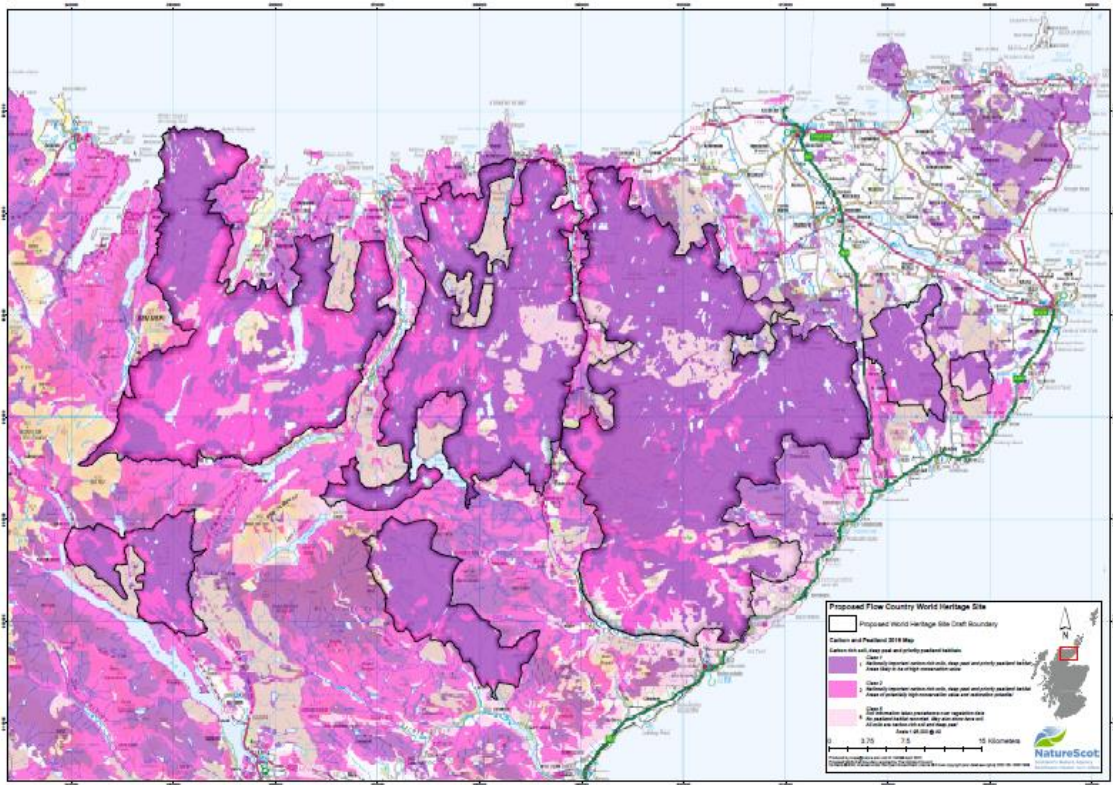


Figure 2: Consultation map showing the proposed Flow Country World Heritage Site outline, overlaying the 2016 Carbon and Peatland Map (NatureScot).

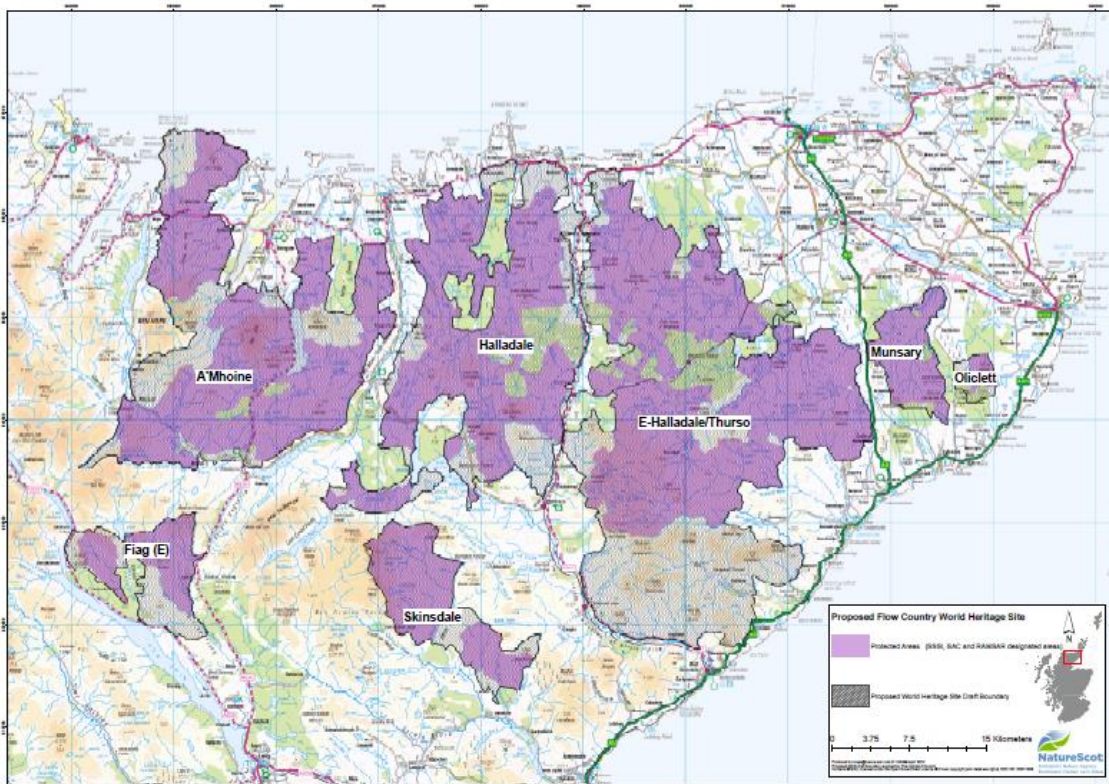


Figure 3: Consultation map showing the proposed Flow Country World Heritage Site boundary and existing designations for peatland habitat. (NatureScot)

## Communication and Outreach

A communications plan set SMART (Specific, Measurable, Attainable, Relevant and Time-Based) goals, with the aim of increasing visibility of consultation events and the World Heritage Site bid. This plan helped to guide communication activities through a variety of platforms.

In addition to this plan, a specialist communications company (Indigo) organised a stakeholder campaign, 'Keep Us Covered', which aimed to engage a variety of audiences, with a particular focus on political audiences.

### Social media

The Flow Country World Heritage Site project has Facebook and Twitter accounts, both of which are used to promote the Project and share news stories relating to The Flow Country or World Heritage. These social media sites are managed by The Partnership.

Facebook: <https://en-gb.facebook.com/TheFlowCountry/>

Twitter: <https://twitter.com/theflowcountry?lang=en>

### Website

The Flow Country website provides information about The Flow Country and the World Heritage Site bid. In the run up to the 2022 consultation, this website also updated visitors about upcoming consultation events.

### Partner Communications

All partners on The Flow Country WHS Working Group were encouraged to circulate important information through their internal communications teams.

### Local and National Media

The Flow Country World Heritage Site Project appeared regularly in local and national media during and before the 2022 consultation period, with upward of 30 articles appearing in 2022. These articles helped to maintain momentum for the bid among key stakeholders, raise its profile for a political audience and encourage more locals to engage with consultation events.

### Mail Drop

From mid-late April 2021, 19,446 double-sided leaflets were delivered in Caithness and Sutherland, providing information about the World Heritage Site bid and details of the upcoming in-person and online consultations. On the reverse side of the leaflet, a full-page 'draft proposed boundary' map was accompanied by a brief rationale explaining how the boundary was chosen.

Every household within close proximity of the draft boundary received a leaflet, including the surrounding towns and villages. Each community council in the region received a copy, as well as several other community groups and the managers of each drop-in venue.



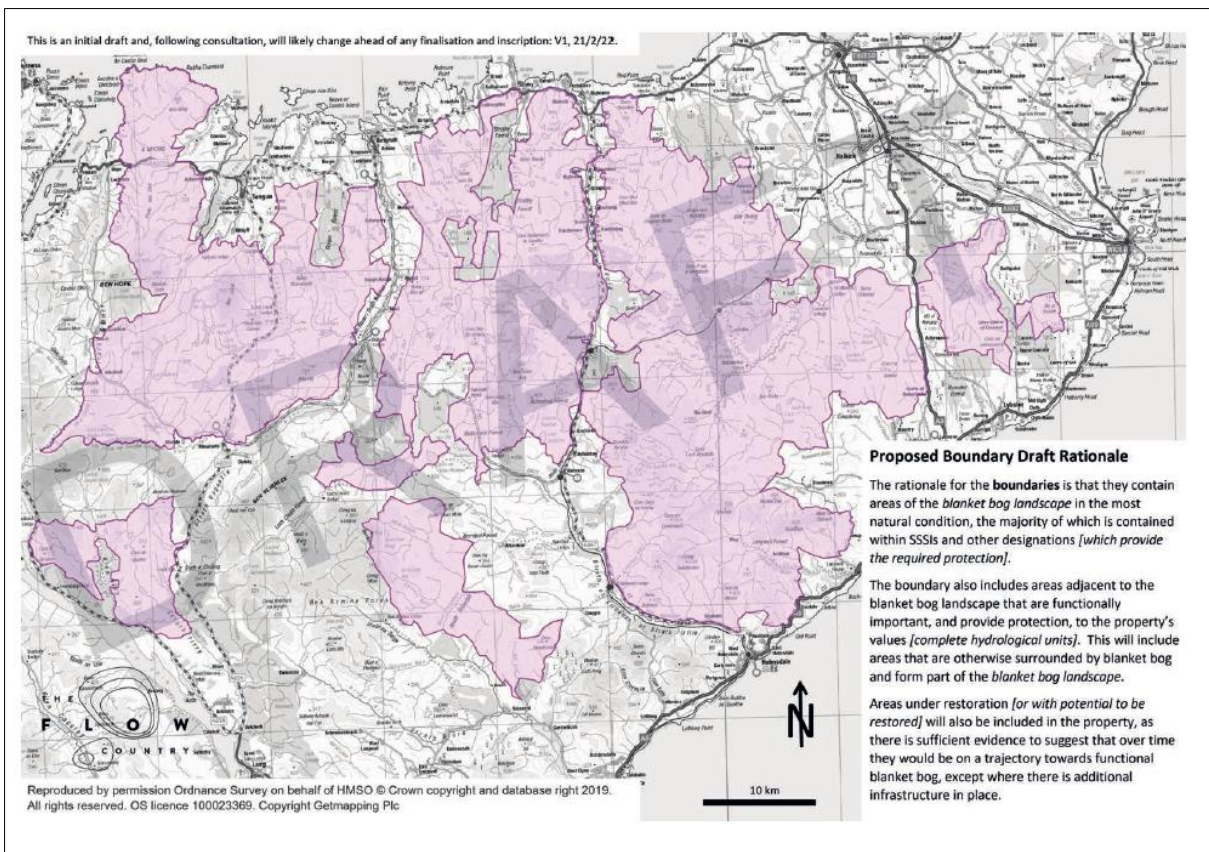


Figure 4: Reverse side of mail drop leaflet, delivered to every household within the consultation area.

## Drop-in Events

In May 2022, the Partnership set up sixteen full-day drop-in sessions around Caithness and Sutherland. These drop-in sessions were held in well-used community buildings including libraries, town halls, museums and community centres. The venues were carefully chosen, so that residents of all of the communities around the proposed World Heritage Site boundary could attend without having to drive for more than half an hour. Almost all of the venues were easily accessible via public transport, however services to some of the more remote locations were sporadic.

Across the 16 days 248 visitors came into these sessions, a 42% increase compared to the 175 visitors received in 2019. The Partnership also identified 80% support from the drop-in sessions, which represents a small increase from the 78% support identified in 2019.

The drop-in events were staffed by representatives of the Partnership, each of whom would take notes of conversations they had and the main themes that emerged (summarised below). Visitors to drop-in sessions were able to view information about The Flow Country World Heritage bid on large display banners, watch a short documentary video and view maps of the boundary, including information on current designations and the distribution of peatlands (Fig. 2 and 3).



Figure 5: Timespan heritage centre, venue for community consultation in Helmsdale.

## Commonplace

The 2022 summer period of in-person consultation overlapped with three months of online consultation, using the Commonplace platform. From May to August, 2,399 people visited the consultation pages, with 230 leaving a contribution and 124 signing up for our newsletter. An evaluation of the sentiment of these contributions found that 74% were supportive of the bid.

The Commonplace platform allowed visitors to view the proposed World Heritage Site boundary on an interactive map which they could annotate with their comments, as well as using traffic light colours to indicate their feelings about elements of the proposal. The platform also included background information on the bid, and a short questionnaire, which encouraged visitors to share their feelings about the project overall and also gave them the option to write at length about different aspects of the bid.

## Main Issues from all Consultation and Engagement Activity

Below is a list of the main issues raised during all consultation and engagement activity. This encapsulates not only the feedback received at the drop-in events, but also through the online consultation portal and through direct feedback from individuals and companies.

**Over-tourism** – The continued success of the NC500 as a driving route was raised as a significant issue during this period of consultation. People were concerned that the road and toilet facilities were being put under too much strain and that tourists were not contributing enough to the local economy. Negative feelings towards tourists led to some consultees feeling concerned at the possibility of more tourists visiting the area as the result of a Flow Country WHS.

**Environmental protection** – Many consultees were keen to see more protection for The Flow Country habitat. Many consultees were very aware of the carbon capture potential of The Flow Country and its importance as a home for important biodiversity; these individuals were enthusiastic about the potential for the WHS designation to support these benefits.

**Funding for community projects** – Several heritage and community groups contributed to the consultation, as well as many individuals concerned with community and heritage projects: a very common theme was the desire for more funding for such projects. It was encouraging that people saw the WHS Project as having the potential to bring more heritage and community investment into the area.

**Forestry** – There were two distinct viewpoints on the issue of forestry and how it related to the World Heritage Site bid: some people were concerned at the reduction in forestry jobs in Caithness and East Sutherland and were concerned that World Heritage Site status could bring further restrictions on planting which would be damaging to the local economy. Others viewed the planting of trees on blanket bog as damaging to the environment and were hopeful that World Heritage Site status might ensure that future forestry was situated in environmentally favourable ground.

**Restrictions to land use** – Some members of the farming and crofting communities expressed concerns about restrictions to their use of land within a World Heritage Site. These concerns sometimes stemmed from negative past experiences with existing environmental designations in the Flow Country area. Restrictions on muirburn and predator control were raised as particular concerns. Outside of the agricultural community, a small number of local residents raised concerns about a World Heritage Site limiting the amount of land for developments such as affordable housing or new businesses.

**Windfarms** – The north Highlands host a large number of onshore and offshore windfarms, some of which are within the Flow Country landscape. Our consultation attracted mixed views regarding current and proposed windfarm developments in the region, including contributions from energy companies. Some consultation responses suggested that there were already too many wind farms in the north Highlands and that their impact on the landscape detracted from the natural beauty of the area, while others pointed to the financial benefits that can be brought to local communities through community development funds.

Some energy companies raised concerns that a World Heritage Site might limit the amount of land in the region available for wind farm development or could make the process of receiving development permission more complex. They noted the strategic importance of the region with regards to renewable energy development and links to national net zero carbon targets.

**Benefits of tourism** – While many responses regarding tourism were cautious, with too many tourists a major issue (especially on the roads) being a major issue, some people felt that there were benefits to be had. Potential boosts to eco and heritage tourism were viewed as having potential benefit for communities which do not receive much tourism income from the NC500. Furthermore, the promotion of more socially and environmentally respectful tourism was viewed as positive.

**Social concerns** – Socio-economic decline, ageing population and depopulation were key issues raised in some parts of the consultation area. These concerns were not as apparent on the east coast or in Thurso but featured more across much of the north and western boundaries of the consultation area. The concerns on this emotive topic are deep, with some local communities expressing distress about their communities “dying”. For these communities, comparisons were made to the past, when there were larger crofting, forestry and family communities. Some people viewed a WHS as a positive factor which could contribute to keeping young people in the area, while other considered it another step in making this region of Scotland “a nature reserve”.

**Boundary Definitions** – Some consultees questioned the rationale behind the proposed boundary and felt either that not enough or too much land was being included. In some instances, this concern related to the definition of “Flow Country” and whether all of the land within the boundary should be labelled in this way. Some consultees, however, were more focussed on the benefits that inscription might bring and were asking why more land had not been included in the proposed boundary.

## Keep Us Covered

The ‘Keep Us Covered’ campaign aimed to garner cross-party support for the World Heritage Site bid by approaching selected representatives in both Scottish and UK parliaments to champion sub-themes of the bid, including biodiversity, carbon sequestration and sustainable land management.

In addition to media engagement and communications advice, Indigo helped to coordinate a Westminster reception in November 2022 and a storytelling campaign. Although outside of the period of this report, the Westminster reception at Dover House, the Office of the Secretary of State for Scotland, was a success, garnering cross party support from Conservatives, Labour, Liberal Democrats and the Scottish National Party.



Figure 6: John Nicolson MP supporting the "Keep Us Covered" campaign. (05/09/2022, Malcolm Cochrane Photography)

## Conclusions

The 2022 Flow Country World Heritage Site consultation was engaged with by a large number of individuals and businesses and confirmed the high level of support which was recognised in the 2019 consultation. The consultation reached every residence in the target area through the mail drop leaflet and a far wider audience was reached through a variety of media efforts. The professional support offered by Indigo boosted the visibility of the World Heritage Site project and helped to attract interest from broadsheet newspapers and key political stakeholders.

A broad range of themes emerged from consultees, with some of the most prominent including potential restrictions to land use, the socio-economic opportunities of World Heritage inscription and the potential for inscription to support a healthier peatland environment in the Flow Country. Many of these concerns are addressed in the answers to the frequently asked questions which are provided in part 4 of this document and have been made publicly available through the Flow Country website.

## Next Steps

The consultation feedback has been key in shaping the World Heritage nomination that has now been prepared by The Flow Country Partnership. The nomination documentation will be officially delivered to UNESCO in early 2023. We anticipate receiving a verdict from UNESCO in 2024, at which time The Flow Country could officially be named a World Heritage Site.

In the meantime, The Flow Country Partnership will remain open and receptive to further engagement with local communities and businesses and will give regular updates regarding the World Heritage Site process. The Flow Country website and the Flow Country World Heritage Site social media channels will remain key platforms for sharing news and project progress.

## Section 2: Community Consultation Activities, May-Aug 2022

### Commonplace online platform feedback and responses: detailed table of responses

Thank you for your interest in the World Heritage Site. We received a good number of written submissions through the Commonplace portal which, put together, raised a significant number of questions or comments about the contents of the document. This is our response.

Some comments are specific, whereas others have been summarised into themes which are addressed in general terms. Any land-specific or personal questions are dealt with in an individual one to one basis and are not recorded here for issues of confidentiality. Likewise, there are no personal details or identifiers against any of the comments. For the most part, supportive comments have not been included here as they warranted no specific response other than our thanks. Most of the comments raised by energy companies are dealt with in Section 3 of this document as the same issues and questions were raised through both consultation processes.

Changes made resulting from this consultation have been taken into account by the team responsible for preparing documentation for submission to UNESCO in December 2022. Any changes needed after this date will be logged and will be used as part of a further public consultation that would immediately follow inscription as a World Heritage Site, should that accolade be achieved in 2024.

Consultees are asked to ensure that all their individual points are addressed, and to contact us if that is not the case.

#### Acronyms

WHS	World Heritage Site	SPA	Special Protection Area	NS	NatureScot
TFC	The Flow Country	SAC	Special Area of Conservation	THC	The Highland Council
OUV	Outstanding Universal Value	SSSI	Sites of Special Scientific Interest	UNESCO	UN Educational Scientific and Cultural Organisation
MP	Management Plan	NPF	National Planning Framework	SM	Scheduled Monuments
EIA	Environmental Impact Assessment	SPP	Scottish Planning Policy	SG	Scottish Government

**Note:** OUV - Outstanding Universal Value – is the primary way in which UNESCO assess whether a place should become a World Heritage Site. More details can be found on the UNESCO World Heritage website.

Comment no.	Summary of comment	Response	Action
Boundary			
1	Land included within the World Heritage Site should be included on an “opt in” basis, rather than an “opt out” basis for landowners. Landowners/managers should be able to request that their land is included if it meets the criteria.	<p>Thank you for your comments and we understand why it might feel that this should be the process.</p> <p>World Heritage Status and OUV is about the global importance of the ecosystem and its biodiversity, irrespective of ownership. We have worked hard to consult with landowners, with the outcome is that most are overwhelmingly positive about the proposals.</p>	Continued ongoing dialogue with landowners.
2	The proposed boundary around [withheld] has arbitrarily joined up two SSSI designated areas, it is not clear why this piecemeal approach has been taken when the original idea for the World Heritage Site was a continuous area from Caithness to Sutherland to include all the “Flow Country”. The deep peatlands are already designated, WH Status wouldn’t appear to add anything to the levels of existing protection, so what is the purpose of it? If it is to increase visitor numbers then this type of boundary will not work, as it is confusing what is “in” or “out” of the WH Site.	<p>Thank you for your comment. The boundary you see is based on a detailed analysis by peatland experts, and includes areas where there is deep peat, or peat in the process of being restored, not all of which is protected.</p> <p>World Heritage status can provide much more than just protection, including profile, jobs, investment etc, and that will be to the area surrounding the Site, not the Site itself which needs to be looked after as a blanket bog.</p> <p>In many respects for visitors it will not be an issue whether an area is ‘in’ or ‘out’, as the wider Flow Country area will have the World Heritage identity, much like at Hadrian’s Wall or the Jurassic Coast.</p>	No action.
3	The extent of the proposed boundary is inappropriately large and encompasses peatland that is degraded/ eroded/ drained/ modified in addition to the high-quality blanket bog landscape habitat it aims to include/protect. Moreover, important peatland/bog habitats are already protected by designations such as SAC and SSSI. It would be more appropriate to restrict the proposed WHS boundary to these areas rather than bringing in additional land that does not meet the definition of blanket bog	We fully acknowledge the consultees points, and it we have discussed this at length. However, Natural World Heritage Site boundaries are based on OUV, not artificial boundaries, administrative areas or protected areas. If the blanket bog landscape, whether in good condition or with the potential to be restored, extends beyond the artificial lines drawn to protect areas, then it contributes to OUV, should be included in the boundary and will be as important a part of the Site as any other.	No action.

Comment no.	Summary of comment	Response	Action
	that is in the best condition and displays the attributes that make it outstanding on a global scale	Scale, extent and continuity of the peatlands is particularly important for demonstrating integrity, and often the areas around the margins of the bigger zones of deep peat are particularly significant as they contain smaller patches of different types of peatlands or wet heath that together make up the blanket bog landscape; contributing to its integrity.	
4	Concern that applying boundary conditions might encourage more intense development just outside of the boundary, in particular for renewable energy developments.	This is a very valid point, thank you. This issue will be noted and considered in a 'setting study' to be developed in 2023.	To be fed into the setting study.
5	<p>Areas of deep and healthy peatland have been left out of the site and should be revisited for possible inclusion.</p> <p>Also areas which have been restored from forest to bog should be included if they are of sufficient quality and within a sensible boundary area.</p>	Thank you for the suggestion. We have tried to include all appropriate and non-isolated areas but will look again at the examples you suggest.	Boundary to be checked.
6	<p>I understand that the gaps between the boundaries are simply because its not blanket bog, but I wonder if having just one large area the encapsulates all of the flow country would be easier for visitors of the area to understand/ navigate.</p> <p>The boundary is extremely convoluted and the overall site is fragmented. The justification for this is unclear, but it appears to be based largely (wholly?) on the existing SPA/SAC designations, which cover only relatively pristine habitat. The WHS boundary should be more encompassing, recognising that many of the excluded areas have restoration potential and buffer the core areas.</p>	Thank you for your comment. In 2019 we considered the wider boundary you suggest, but took advice and in terms of how the Site can be best looked after and managed, the detailed 'blanket bog-only' is simpler and better for communities. It also allows for the Site to be expanded as areas of formerly degraded blanket bog become restored.	No action.

Comment no.	Summary of comment	Response	Action
Renewable Energy			
7	Applying a WHS designation to circa 200,000 ha of the north highlands would undoubtedly be detrimental to renewable energy development, adversely impacting on Scotland/UK progress towards binding carbon reduction targets. (Note, nearly 50,000 ha of the proposed WHS is not already subject to designation.	Thank you for your comment. Policies relating to wind energy development can be seen in the draft Site Management Plan which is available on theflowcountry.org.uk	No action.
8	There are too many windfarms in Caithness and Sutherland at the moment. World Heritage status should prevent more windfarms being installed and this would be beneficial to the visitor experience	Thank you for your opinion. Policies relating to wind energy development can be seen in the draft Site Management Plan which is available on theflowcountry.org.uk	No action.
9	The Flow Country landscapes are an important part of its value. Wind energy development has a negative impact on these landscapes.	Thank you for your comment, although landscape values are not part of the OUV of the proposed WHS. Policies relating to wind energy development can be seen in the draft Site Management Plan which is available on theflowcountry.org.uk	No action.
Land use/Management			
10	<p>Commercial Forest Areas should be removed from the World Heritage Site. Concern that World Heritage status could harm forestry industry.</p> <p>We need both healthy active peatlands AND areas of productive forest going forward. Local and regional long-term employment and investment is threatened by this reduction of forest cover and there are too many constraints on new planting to make up for the area lost. People who live here need to be able to work the land in some way and commercial forests have provided sustainable long-term employment and careers. We need more not less productive forests and inclusion of these once productive areas in the WHS could be detrimental to the local economy.</p>	<p>Thank you for your comment. Policies relating to commercial forestry can be seen in the draft Site Management Plan which is available on theflowcountry.org.uk.</p> <p>Areas of forestry within the boundary are only those for which there is a clear restoration pathway, but it is important to recognise in Scotland that there is now a presumption against planting commercial forestry on deep peat.</p>	No action.



Comment no.	Summary of comment	Response	Action
11	Communities should be included in decision making for how the land is used. Historic forestry and renewable energy generation has not adequately included local voices. World Heritage should serve to connect more local people to decision making around how the land is used within the boundary.	The Flow Country Partnership has led this WHS bid and is made up of people from the local communities, including elected members. Should WHS status be achieved, this Partnership is likely to be managing the Site, ensuring that communities have a say in how it is managed.	Continued consultation and community engagement.
12	More investment into local muir burning could help to maintain fire breaks which, in turn, could protect the wider peatland habitat from uncontrolled wildfires.	Policies relating to muirburn can be seen in the draft Site Management Plan which is available on <a href="http://theflowcountry.org.uk">theflowcountry.org.uk</a> .	No action.
13	Areas included within the proposed boundary are already protected by SSIs, SACs, SPAs and Ramsar. The addition of World Heritage status is unlikely to add additional protection and therefore it is unnecessary, except for the benefits that increased tourism may provide.	Not all (27%) of the blanket bog included within the proposed WHS is protected by existing designations. Moreover, World Heritage status can provide much more than just protection, including profile, jobs, investment etc, and that will be to the benefit of the communities surrounding the Site itself.	No action.
14	The boundary has been drawn extremely close to the proposed Sutherland Spaceport and will be crossed by rocket launches. Is there a risk that spaceport operation will be adversely affected by the proposals?	Planning permission has already been granted for the spaceport so we cannot see any way in which its operation will be adversely affected by the proposals.	No action.
15	Concern that World Heritage status might bring additional restrictions to residents.	Most of the Site is already legislated through existing environmental designations. For the 27% that is not designated, WH Status will not bring in extra restrictions, but will be a material consideration in planning.  See the FAQs as part of this document for a more detailed answer	No action.
16	Some crofting/agricultural and afforested land is partially covered by existing designations, such as SSSIs. An area of grazed land may be half in and half out of an existing designation, meaning that certain practices area permissible on one half of a farm/afforested area, but not on the other. The concern is that a World Heritage Designation which encompasses will replicate the restrictions of an existing designation on adjacent, but currently undesignated land.	WH Status will not bring in extra restrictions but will be a material consideration in planning. See the FAQs as part of this document for a more detailed answer.	No action.

Comment no.	Summary of comment	Response	Action
Potential increase in visitor numbers			
17	An increase in visitors could lead to an increase in off-leash dogs. This might cause problems for sheep farmers. Dog owners should be encouraged to act responsibly and respect local livestock management.	This is a very valid point, thank you. This issue will be noted and considered during revision of the proposed Site's Management Plan.	To be considered in the MP revision.
Nature protection and promotion			
18	World Heritage status for The Flow Country offers opportunities to raise the profile of the peatlands and give more people access to local nature.	This is the intention, but increased access must be done in a way that does not lead to damage to the peatlands.	No action.
19	Historic mismanagement has reduced habitat quality across Caithness and Sutherland. World Heritage status could help to protect and restore areas of the peatland.	This is the intention. World Heritage Status is likely to attract greater investment for peatland restoration and maintenance.	No action.
Economic opportunities			
20	I think the heritage site would be a hugely beneficial for the future of this area, I am delighted that it is being recognised as a very special part of the world and not just a tourist route around the coast, world heritage status would create employment for young local people like myself who wish to continue living in the area.	Thank you for your comment.	No action.
21	Encouraging tourists and locals alike to visit and enjoy the flow country should be something that effort is put into by Visit Scotland and NC500. Gaining world heritage status could benefit local communities, tourism operators, visitors, and those restoring the areas.	Thank you for your comment, we already work closely with Visit Scotland.	No action.

Comment no.	Summary of comment	Response	Action
Local Communities			
22	Local customs and cultures must not be forgotten in this World Heritage Site project. Generations of families have created the habitats which make up the proposed World Heritage site and their stewardship of the land should be recognised and respected.	We could not agree with this comment more and this aspect is strongly interwoven into the nomination documentation and we plan to make this a feature of any future interpretive materials.	No action.
23	This road is a main logging route known and financed by the Highland Council for the next 15 years. The route needs high maintenance due to subsidence; Damaging the peatland. There needs to be a Government review logging lorries v Train freight of emissions and infrastructure.	This comment will be passed to the Highland Council.	Comment to be sent to THC.

## Section 3: Draft Flow Country World Heritage Site Management Plan consultation Jul-Sep 2022

### Detailed table of responses

Thank you for your interest and input into the draft Plan. The consultation period lasted for 8 weeks and we received nine written submissions which, put together, raised a significant number of questions or comments about the contents of the document.

Points which welcome or support aspects of the Plan are not included in this consultation response, which is focused on addressing questions or comments that would seek to see a change in the Plan's contents or want an answer to a question they have about the Plan or proposed Site.

Points that are repeated through identical or similar wording multiple times in the same or a different submission are not repeated in this table. Consultees are asked to ensure that all their individual points are addressed, and to contact us if that is not the case.

Changes made because of this consultation will be integrated into a revised Plan for submission to UNESCO in December 2022. Any changes needed subsequent to this date will be logged and will be used as part of a further public consultation of the Plan which would immediately follow inscription as a World Heritage Site, should that accolade be achieved.

#### Acronyms

WHS	World Heritage Site	SPA	Special Protection Area	NS	NatureScot
TFC	The Flow Country	SAC	Special Area of Conservation	THC	The Highland Council
OUV	Outstanding Universal Value	SSSI	Sites of Special Scientific Interest	UNESCO	UN Educational Scientific and Cultural Organisation
MP	Management Plan	NPF	National Planning Framework	SM	Scheduled Monuments
EIA	Environmental Impact Assessment	SPP	Scottish Planning Policy	SG	Scottish Government

**Note:** OUV - Outstanding Universal Value – is the primary way in which UNESCO assess whether a place should become a World Heritage Site. More details can be found on the UNESCO World Heritage website.

Comment no.	Summary of comment	Response	Action
Timing			
1	Concern was expressed about the overlapping dates for the consultations for the boundary and this Management Plan and whether the consultation responses on the boundary will be fully taken into account?	The boundary consultation will feed into the revision of the Management Plan post consultation, and all responses will be considered in relation to the points made and any potential impact on the proposed Outstanding Universal Value. The overlap was necessary due to UNESCO deadlines.	No change.
Boundary, buffer zone and setting			
2	In respect of the boundary, consultee/s suggested that it would be more logical to consider the land-use activities which are present, and which are expected to continue within and on the edge of the proposed World Heritage Site, and then to address the boundary that would be appropriate recognising that land-use distribution and activity.	<p>We acknowledge your concern, but World Heritage is about identifying those places that are so important for the planet as individual or representative places or ecosystems, that they transcend national boundaries, and are protected for ever, not 25, 50 or even 250 years.</p> <p>Therefore, defining the boundary for a WHS is based primarily on the land area in which OUV can be demonstrated, not on existing land-use. The criteria for the proposed boundary have been set out clearly and are based on the natural values of a blanket bog landscape and integrity.</p> <p>Land-use is of course considered, and areas with severely degraded peat have been removed, but if the area has a natural value that means it is, or is identified by peatland experts as having the potential to be a part of the blanket bog landscape, then it is included. For further clarification the rationale for the boundary is set out in the draft Management Plan.</p>	No change.
3	There was a question as to whether the seven geographic areas currently in the MP are subject to review pending the outcome of the conclusions from the boundary consultation?	Yes, we will continually review the boundary until the nomination is submitted.	Changes will be made if appropriate and the boundary will be re-published.

Comment no.	Summary of comment	Response	Action
4	<p>Consultee/s contest that it is not considered necessary to include additional land areas within the proposed WHS boundary which are not afforded those statutory protections namely covered by SPA, SAC and SSSI.</p> <p>There are additional comments worded differently but effectively saying the same thing, that the boundary should be restricted to the c. 76% that is currently protected through statutory protections.</p>	<p>We fully acknowledge the consultees points, and it we have discussed this at length. However, Natural World Heritage Site boundaries are based on OUV, not artificial boundaries, administrative areas or protected areas. If the blanket bog landscape, whether in good condition or with the potential to be restored, extends beyond the artificial lines drawn to protect areas, then it contributes to OUV, should be included in the boundary and will be as important a part of the Site as any other.</p> <p>Scale, extent and continuity of the peatlands is particularly important for demonstrating integrity, and often the areas around the margins of the bigger zones of deep peat are particularly significant as they contain smaller patches of different types of peatland or wet heath that together make up the blanket bog landscape; contributing to its integrity</p>	No change.
5	Consultee/s requested for clarification that there will be no buffer zone.	That is correct, there will be no buffer zone. This is set out clearly in the Plan in both pages 32 (Statement of OUV) and 47 (geographic framework). A rationale is given.	No change.
6	Consultee/s requested clarity in respect of the position on the setting.	<p>The setting is less clear than a buffer zone. Every WHS has a setting, it is not an option, but it is the defined extent of that, and the rationale behind it that need to be clear.</p> <p>The discussion around the setting in the Management Plan is set out on pages 24-26, and the 'setting' is referred to elsewhere in the document.</p> <p>Because it is such a large area, and issues around setting are complex, we propose to undertake a piece of detailed work between submission and potential inscription in 2024 to set out more clearly the implications of a WHS setting, and define, whether by words or a line on a map, its extent. We will invite collaboration from partners, consultees of this plan and residents.</p>	Setting study to be commissioned in 2023.

Comment no.	Summary of comment	Response	Action
Policy			
7	Consultee/s observed that it is imperative that the provisions of the soon to be published NPF4 are taken into account in the final Management Plan and the related submission documents to UNESCO. One consultee made specific reference to content on p68.	<p>This will be done, but to what extent and when depends on when NPF4 is adopted. The nomination and revised MP will be submitted to UNESCO in December, which is a fixed deadline.</p> <p>Current indications are that there will be no time to adapt the MP to account for this due to the date when the SG will formally agree NPF4, so changes will be made post-submission and prior to the visit of the assessors. We are also currently choosing <u>not</u> to refer to the draft NPF4 because, as yet, it has no legal status.</p> <p>From the draft NPF4, we do not foresee any major changes, indeed, only potential improvements to protection of peatlands.</p>	This will be actioned post submission.
8	Consultee/s comment, in light of net zero targets, NPF4 and the Onshore Wind Policy Statement Refresh that <i>“it is considered imperative therefore that the management approach for the WHS should not unduly preclude the further deployment of onshore wind.”</i>	We understand consultees’ comments, and we can assure you that the WHS, should it be designated, will not unduly preclude the further deployment of onshore wind as long as there are no negatives impact on OUV. There are clear policies in the Plan in reference to this.	No change.
9	Consultee/s state that there should be explicit recognition as set out in the current draft Onshore Wind Policy Statement Refresh that the Government is expecting <i>“a consistently higher rate of onshore wind and other renewables capacity, year on year”</i> . Moreover, they comment that full account should be taken of the new Onshore Wind Policy Statement which is expected to be published in late 2022.	Thank you for your comments. The consultation response to the document you mention <sup>3</sup> states: <i>“Developers are encouraged to discuss with planning authorities appropriate sites for wind turbines at an early stage with reference to the adopted local development plan.”</i> It is likely therefore that when, and even before the MP is adopted by THC, the planning authority would need to steer developers away	Information from the refresh will be integrated in Chapters 4 and 6 once they it is published.

<sup>3</sup> <https://www.gov.scot/binaries/content/documents/govscot/publications/consultation-paper/2021/10/onshore-wind-policy-statement-refresh-2021-consultative-draft/documents/onshore-wind-policy-statement-refresh-2021-consultative-draft-28-october-2021/onshore-wind-policy-statement-refresh-2021-consultative-draft-28-october-2021/govscot%3Adocument/onshore-wind-policy-statement-refresh-2021-consultative-draft-28-october-2021.pdf>

Comment no.	Summary of comment	Response	Action
		from siting a wind turbine array on the peat of the WHS. The FCP is supportive of this more strategic approach to the siting of wind farms.	
10	Consultee/s suggested that the biodiversity strategy section, p40, does not reflect the more ambitious proposals coming through the Scottish Biodiversity Strategy to 2030, as set out online, and that this whole chapter could be strengthened with its inclusion.	Many thanks for making this suggestion – it can only be supportive to the long-term future of the Flow Country to have this level of aspiration in Government.	Integrate into Chapter 4 appropriately.
11	Consultee/s pointed out that Section 5.2 needs to be updated to reflect changes in the Planning (Scotland) Act 2019, due to the Transforming Planning work undertaken by the Scottish government, and provisions for NPF4 and new Local Development Plans.	Many thanks for this observation, although Planning changes on a regular basis whereas this Plan is a one in 5 or 6 year point in time, so cannot always be expected to be up to date.	Integrate into Chapter 5 appropriately.
12	Consultee/s observed that Chapter 5 seems to reference mainly development management issues, and could be strengthened by the inclusion of other land use policies which could shape the Flow Country, such as agriculture, forestry etc.	<p>Many thanks for this observation. Development management is still the ‘gatekeeper’ for decision-making on most developments, but we appreciate that there are some interventions or changes that don’t go through the system, so we will integrate these references where appropriate.</p> <p>Moreover, we will consider a role for the FCP in influencing policy in forestry, agriculture and renewables in respect of the Flow Country areas ‘upstream’ of proposals being proposed.</p>	Integrate into Chapter 5 appropriately and consider creating new policy to influence strategy in forestry, agriculture and renewables with regards the flow country.
13	Consultee/s suggested that the section on Deer Management on p63 could be updated to reflect the conclusions of the Scottish Government’s Deer Working Group.	Many thanks for this suggestion, the work of the DWG is useful to see, and we will extract anything from it that can add to the information and discussion in Chapter 6.	Amend Chapter 6 if necessary.



Comment no.	Summary of comment	Response	Action
Development-specific issues (wind farms and spaceport).			
14	Consultee/s consider that current proposals for wind energy development should not be seen as a “threat” as described in the MP but rather an opportunity to demonstrate the continued successful co-existence of appropriately sited renewable energy developments close to the Caithness and Sutherland peatlands.	<p>We understand consultees’ concerns, and in fact this theme is covered in the MP, which refers to successful co-existence of wind energy and the proposed WHS, and the fact that turbines are already a part of the landscape. However, any proposals for turbines that might impact negatively on OUV would be considered a potential risk to OUV until this is proven otherwise.</p> <p>In light of these comments and language used in the draft NPF4, we will consider whether the phraseology can be softened with risk or challenge used instead of threat.</p>	We will consider the language used, but if there may be a negative impact, this needs to be reflected in the Plan.
15	There are several comments which make the point that if the wind farms were stopped from being built on certain areas due to the location of the WHS boundary, then the opportunity to restore those areas of blanket bog using funds from the wind farms would be lost.	It is likely that in the specific cases that are mentioned, these funds may no longer be made available should the wind farms not proceed. However, there are other sources of funding, such as Peatland ACTION or carbon and biodiversity-related green finance which could be used for this purpose.	No change.
16	Consultee/s comment that it is not considered relevant to state [in the MP] that “ <i>there are potential threats to the bird populations which inhabit the peatlands from wind farms adjacent to the proposed site</i> ” as there is no evidence to support that assertion.	Thank you. You are right to say that NS would consider this through examination of an EIA. However, because birds are part of the OUV of the Site, it is relevant to highlight the potential risk within the Plan. This issue is also highlighted because the evidence concerning cumulative impact of wind arrays on birdlife is currently inconclusive, and there is a piece of work underway which is designed to investigate this potential issue.	No change until further evidence is available.

Comment no.	Summary of comment	Response	Action
17	<p>In relation to the above points consultee/s have asked how the policies would work in respect of the following example: <i>“a wind energy project where there was some impact on the peatland related habitat resource from tracks and turbine bases but there was a much more substantive area of peatland restoration proposed (i.e. a net benefit overall)”</i>. They state that if such a development be opposed, the way the policy is currently drafted does not allow for a balanced judgment to be made.</p>	<p>In response to the example, if the proposed negative impact was within the boundary area, the scheme would be opposed, irrespective of any net benefit. This is an aspect of the World Heritage Convention in that a negative impact on OUV in one area of the Site is a negative impact on the whole Site’s OUV. It is only by maintaining a hard line that UNESCO are able to support the maintenance and conservation of these incredible places, rather than allowing cumulative, and often irreparable, erosion of OUV, irrespective of net gain elsewhere.</p> <p>As stated above, there are many other ways by which peatland restoration can be funded other than from wind farm schemes, and it does not justify potentially significant damage to within-boundary blanket bog from tracks, turbine bases and other associated infrastructure.</p>	<p>We will rescrutinise these policies but there is unlikely to be any change.</p>
18	<p>Consultee/s state that there should be explicit recognition of wind energy development as part of the ‘working’ landscape of Caithness and Sutherland which can continue to successfully co-exist and further evolve.</p>	<p>We believe that this is already expressed adequately within the Management Plan but will be accounted for more in the setting study to be undertaken between submission of the nomination and potential inscription.</p>	<p>No change.</p>
19	<p>There are specific questions relating to potential wind farm developments at: Shinness (Shinness), Ackron (Statkraft) and Kirkton (Wind 2).</p>	<p>The general questions from these submissions have been dealt with in this document. The site-specific submissions relate to your clients potential business interests, so it would not be appropriate to put forward detailed comments in this forum. We will contact you directly in this regard once this, more general consultation report has been released.</p>	<p>N/A</p>
20	<p>Consultee/s mentioned the potential impact of the The Moine rocket launch site.</p>	<p>The proposals for the Moine rocket launch site have already been given planning permission, so in respect of these proposals, this is an existing (planned) development which would be part of the setting of the Site at inscription.</p>	<p>No change.</p>

Comment no.	Summary of comment	Response	Action
Protection			
21	<p>Consultee/s observed that page 50 of the MP misses out a very important point from the SPP in relation to “areas of significant protection”, specifically stating:</p> <p><i>“recognising the need for significant protection in these areas wind farms may be appropriate in some circumstances. Further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation”.</i></p>	<p>Thank you for pointing this out. For avoidance of doubt, we have been conscious that WHS are not currently a Group 1 ‘no go area’ for windfarms in the Spatial Framework, but we agree that it would better for the Management Plan to include the fuller explanatory wording for Group 2.</p>	<p>Reference in the relevant chapter and provide a full explanation about the Group 2 areas in respect of wind farms.</p>
22	<p>Consultee/s pointed out that in respect of the SPA/SACs, it is worth highlighting that there are international obligations for safeguarding these sites through the Bern Convention, as components of the Emerald Network.</p>	<p>Many thanks for this observation as it strengthens the international significance of the designations.</p>	<p>Integrate into Chapter 5.</p>
23	<p>Consultee/s observed that the final para of p53 is not strictly true as the ‘Operations Requiring Consent’ provisions on SSSIs apply to land use change not covered by another statutory undertaker.</p>	<p>Many thanks for pointing this out.</p>	<p>Pg 53 final para will be amended accordingly.</p>
Drafting, explanation and corrections			
24	<p>Consultee/s consider that the proposed policy approach around policies 1.7-1.11 needs more explanation to allow for proper interpretation and application.</p>	<p>This is a valid point and would be undertaken through the development of planning guidance once the MP has been adopted by the THC, which would not be until after inscription in 2024.</p>	<p>Follow up with THC in due course.</p>
25	<p>Consultee/s pointed out that on p37, the ‘Wildlife and Natural Environment (Scotland) Act 2011 28 and the Nature Conservation (Scotland) Act 2004’ are references as UK legislation whereas they are in fact just Scottish.</p>	<p>Many thanks for this correction.</p>	<p>Amend text accordingly.</p>

Comment no.	Summary of comment	Response	Action
26	Consultee/s suggested that some of the language that refers to on-shore wind development is more confrontational than it needs to be, particularly as these matters will need to be addressed on a case by case basis. In line with current government documentation and approach, rather than using the word 'threat', impact or challenge may be more realistic and conciliatory.	Many thanks for the observation. We have referenced this above in a different context and where appropriate we will look to use risk, impact or challenge instead.	Consider revisions to wording in relevant chapters.
27	Consultee/s observed that in respect of p67, the MP needs to be careful with using the term 'national developments', which has a specific meaning under NPF4.	Many thanks for pointing this out. Terminology changes all of the time, but it is important for the MP to align with NPF4.	Make changes if needed on publication of NPF4.
Historic Environment			
28	Consultee/s note that it would be helpful to list scheduled monuments [(SMs)] as relevant designations within section 5.3, not only because they highlight the length of human settlement in the area but also because any future proposals for intervention may raise management issues for these nationally important assets.	Many thanks for this helpful comment.	Consider listing the basis of scheduled monuments in Chapter 5 of the Plan, and link to a map of any SMs that are within the proposed boundary.
29	Consultee/s observed that any proposals to restore peatland should also take the historic environment into account. They indicate that the Association of Local Government Archaeological Officers Scotland has produced guidance on this issue.	Many thanks for this helpful comment.	This requirement will be built into the policy framework.

Comment no.	Summary of comment	Response	Action
Technical questions			
30	Referring to page 64, consultee/s asked for evidence that the decline in muirburn practice has increased the risk of wildfire, as compared to the influence of dryer periods of weather caused by climate change.	Thank you for this request. The literature is unclear on this question and the comment on p64 is anecdotal. We will clarify the uncertainty in the text and seek further research.	Make appropriate change to MP
31	Referring to page 71, consultee/s questioned whether the pressures from angling on fish and mussel populations in the rivers is of siltation.	To be clear, the pressures on fish and mussel populations are from angling and siltation, but neither are major.	Check this is clear.
32	Referring to page 64, consultee/s welcome the objective to “support research into cumulative impact of wind farms on bird populations”, but do not wholly agree with the statement that “there is currently limited evidence with respect to the cumulative impact of multiple wind farms on bird populations”.	We recognise the concerns expressed here and will make a change from “limited evidence” to “insufficient evidence”.	Amend wording accordingly.
33	Consultee/s referred to the fact that peatland’s role in atmospheric oxygen production had been overlooked and should be mentioned within the document.	Many thanks for your comment and you make a valid point. We will look at the text around the proposed Site’s ‘special values’ and consider whether there is anywhere to include suitable wording.	Amend text if appropriate.
34	Consultee/s asked whether mention of 'climate emergency' was just “playing to the gallery”, and considered that given growing scepticism regarding climate change, the application for WHS should stand robustly without this.	Thank you for raising this point. We are comfortable that both the Nomination Dossier and Management Plan play to the strengths of the blanket bog’s natural properties – outstanding ecosystem and biodiversity – but also that they recognise its role as a carbon store which is intrinsically a valuable ecosystem service.	No change

Comment no.	Summary of comment	Response	Action
Community engagement			
35	<p>Consultee/s noted that although the population density within The Flow Country is low, they believe the people who live and work within it should be given more emphasis. The Consultee asks what people want from this status, and how would this in turn affect the OUV, through increased population and accompanying infrastructure?</p>	<p>Many thanks for raising this. The FCP is comprised in part of people who live and work in the area, and they are committed to making sure that the status would work for local people. We will look again at the plan through this lens to ensure that their needs and opportunities for engagement are being met.</p> <p>In respect of OUV, it is very unlikely that increased population and accompanying infrastructure would impact on OUV due to the provisions in the MP about development, the protected status of most of the proposed Site, and the local development plan. Moreover, the main communities within the area are outside of the proposed Site boundary, so changes within those communities will have no impact on OUV.</p>	<p>We will review the text to ensure communities are fully represented.</p>
36	<p>Consultee/s observed that in Table 2.2 on page 27 makes no mention of the further clearance of people from the land as a result of the post-war tree planting and particularly the tax-boom planting. The WHS status could help, and should, redress this.</p>	<p>Depopulation in the highlands is an ongoing and complex situation, with peaks and troughs of change, but to mention each peak would be too much detail for the Table. We agree that WHS status could help redress depopulation.</p>	<p>No change.</p>

## Section 4: Frequently Asked Questions

### How might a Flow Country World Heritage Site benefit me?

The potential benefits of World Heritage Status can be wide ranging and will be there to take advantage of if desired:

- **Branding of produce** and marketing opportunities facilitated by the World Heritage project.
- Potential to **add value to carbon investments**, working alongside the developing Flow Country Green Finance Project.
- **Jobs and training** boost around peatland restoration work.
- Profile of the region elevated, bringing **increased potential for investment**: ‘putting the Flow Country on the map’.
- **Drawing tourism away from the periphery** and slowing down those that visit: the Flow Country is a shy landscape that needs time to be appreciated.
- World Heritage is often seen to be a **catalyst for investment in infrastructure**.
- On a global scale, World Heritage Status for the Flow Country will promote the importance of peatlands around the world, helping other areas to gain more protection from degradation and ultimately helping the **fight against climate change**.

Find a wider summary here: <https://www.hie.co.uk/our-region/casestudies/flowcountry/>

#### Case Study - The Jurassic Coast

*It is recognised that World Heritage inscription of the Jurassic Coast **stimulated the creation of a new identity** for the coastal region. It has also been found that the coastal region has **become more dynamic** as a result of this new identity, which is demonstrated in the following ways:*

- *increased investment*
- *better partnership working*
- *increased media recognition at a national and international level*
- *new infrastructure and services*
- *new business start-ups with new products*
- *new employment opportunities*
- *the increasing sustainability of the tourism product*
- *improved education linkages nationally and internationally*

From: An Economic, Social and Cultural Impact Study of the Jurassic Coast (2008)

The annual financial benefit of UNESCO designations to the UK is a minimum of £151 million.

### Will a Flow Country World Heritage site bring extra restrictions?

For areas of the land that are already covered by environmental designation for peatland interests (73% of the proposed site is covered by SSSI/SPA/SAC/Ramsar designations), inscription as a World Heritage Site will bring no extra restrictions. In the remaining 27% of the proposed site World Heritage status will not prohibit any developments, but will be a material consideration. This will be particularly relevant if the proposed development would negatively impact the Outstanding Universal Value of the site (blanket bog landscape or the biodiversity it holds). In practice though this is more likely to be a significant consideration for larger scale developments than for smaller ones – and often such developments are already needing to consider potential impacts on the nearby designated areas and on peat generally.

*Examples:*

- No changes to levels of livestock grazing.
- No change to peat cutting rights.
- No change in deer management

### **Will World Heritage Status fossilise the landscape and stop developments?**

No. World Heritage commits to protect, conserve, present and convey the values of sites inscribed to future generations and UNESCO recognise that World Heritage Sites are where, or near where people live and work, so understand that development happens. UNESCO require that protection is already in place, which it already is for the Flow Country through the existing designations and the planning system. The Flow Country Partnership recognises that the Flow Country is a living landscape that has been home to people for the last 8 thousand years: the people have shaped the landscape and the environment has shaped the people. The draft vision for the Flow Country World Heritage project states that *'World Heritage Status for the Flow Country will ensure that its world-class blanket bog, associated biodiversity and carbon storage ability is protected and enhanced, that it is an unparalleled and accessible natural resource for education and well-being, and that the status is beneficial both for our vibrant communities and our visitors'*.

### **Who is leading the bid for World Heritage status?**

The bid for World Heritage status for the Flow Country was initiated by the Flow Country Partnership, a body comprised of the main stakeholders in the peatlands and adjacent communities across the region. The Flow Country Partnership is, in essence, well established – it was formed in 2006 (then the Peatland Partnership) with the aim of enhancing and promoting the special values of the peatlands of Caithness and Sutherland, through the promotion of sustainable land management, the encouragement of sustainable community and economic development, and through co-ordinated action. More information about the Flow Country Partnership can be found here: <https://www.theflowcountry.org.uk/about-us/the-peatlands-partnership/>

### **What is the Flow Country being nominated for?**

The Flow Country is being nominated to UNESCO for criteria ix and x as defined in the UNESCO World Heritage Convention. These relate to outstanding examples of ongoing ecological and biological processes (ix) and outstanding examples of natural habitats and biological diversity (x). More simply put, the blanket bog landscape (ix) and the biodiversity it contains (x). The Cultural history is also a key component within the bid but does not coincide with the natural criteria for which it is being nominated. More information can be found here: <https://whc.unesco.org/en/criteria/>

### **How is the Flow Country defined?**

Everyone has a slightly different conception of where the Flow/Flowe/Flough Country is. The proposed World Heritage Site is being nominated on the basis of the blanket bog landscape which stretches across much of Caithness and Sutherland. Therefore, the proposed World Heritage Site attempts to take in all of the diversity in peatland landscapes which can be found across this region, based on (but not limited to) the already recognised Peatlands of Caithness and Sutherland SPA/SAC/Ramsar designations. This includes the wetter and more broken blanket bog found in the west and the more rolling and continuous examples found to the east.

### **What is the rationale behind the boundary?**

The rationale for the boundaries is that they contain areas of the *blanket bog landscape* in the most natural condition and containing the full range of diversity found across the region, the majority of which is contained within SSSIs and other designations.

The boundary also includes areas adjacent to the blanket bog landscape that are functionally important, and provide protection, to the property's values. This will include areas that are otherwise surrounded by blanket bog and form part of the *blanket bog landscape*.

Areas under restoration will also be included in the property as there is sufficient evidence to suggest that over time, they return to naturally functioning blanket bog; except where additional infrastructure, such as tracks, etc. causes excessive disruption to the blanket bog hydrology.



**Will the proposed World Heritage site have a buffer zone?**

The proposed site will not have a buffer zone. These are not considered as appropriate for natural sites in Scottish Planning Policy given the protection already afforded by SSSI/SPA/SAC/Ramsar designations.

**How are we talking to communities and stakeholders?**

An initial consultation on the concept of a Flow Country World Heritage site was held in 2009, resulting in the recognition of broad support (80%) for the project. Since then, updates on the progress on the project have been provided through press releases, widely picked up in the local and national press (Northern Times, John O’Groats Journal, Press and Journal, Scotsman, Herald, Times), TV and radio coverage, social media, and the Flow Country Website. Presentations have also been given to a wide range of stakeholders and interest groups including Deer Management Group, Fisheries Trusts, Tourism Groups, etc.

Further public consultations have been held during 2022: on the draft boundary (May – July) and on the draft management plan (July – September). Increased participation has been recorded and early indications from face to face drop in events are for a similar level of support as found during the 2019 consultation (80%).

The formal consultation has now closed but we will continue to engage with local communities to keep them informed of the bid progress and are always happy to take on views and answer questions.

**How will The Flow Country World Heritage Site be looked after?**

The main body that will oversee the World Heritage Site, should it be inscribed, is a partnership-based Steering Group. This group, which currently exists to oversee the bid process, has representatives from all of the different stakeholders who would have a role in looking after the Site. This includes community representatives as well as landowners and agencies. In addition, there will be a small professional team to oversee the Site, and a range of technical working groups to focus on specific subjects. All of these bodies will be focused on delivering the vision set out above.

**When will we know if the bid has been successful?**

We hope that we will know in summer 2024, when the World Heritage Committee meet and make the decision.