



DAVAGH DARK SKY PARK

SCOPING PAPER FOR UNESCO WORLD HERITAGE
SITE DESIGNATION

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Introduction

Mid Ulster District Council Officers working alongside Dr Liam Campbell and Dr William Burke have drafted a position paper in response to a motion brought forward by Cllr. Clarke and amended by Cllr. Mallaghan *“That Mid Ulster District Council resolves to explore the necessary steps to have Davagh Dark Sky Park officially designated a UNESCO World Heritage Site”* (C144/20).

The purpose and scope of the paper is to provide Council Officers and elected Members’ with an introduction on what a World Heritage Site (WHS) is, how sites are selected and the process of designation. In summarising these, the paper goes on to provide a synoptic overview of what makes the Davagh region unique in respect of the WHS qualifying criteria and outlines the broad time scale and resources required to reach the nomination stage.

Location

The Davagh Dark Sky Park project is located in Davagh Forest which lies approximately 10 miles north of Cookstown (Figure 1) at the foot of the Sperrin Mountains and in an Area of Outstanding Natural Beauty. The Park has been designated as an International Dark Sky Park, making Davagh the first-ever IDSP in Northern Ireland. Along with this designation a new OM Dark Sky Park and Observatory will open in October 2020. The archaeological significance of the region has been recognised by the Historic Environment Division in its designation as an Area of Significant Archaeological Interest (ASAI) and is known to contain multiple prehistoric sites. The surrounding region is rich in Neolithic and Bronze Age monuments, comprising chambered tombs and court cairns, standing stones, cairns, alignments, cist graves and stone circles, of which the best known are the Beaghmore and Copney stone circle complexes. Beaghmore is about 3.25 km SW of the site, the Ballynagilly Neolithic habitation site is about 4.25 km to the SE. The area of the site has been moorland since the growth of peat in the Late Bronze Age, the only probable economic activity being sheep grazing. It has remained undisturbed by agriculture, as far as can be determined.

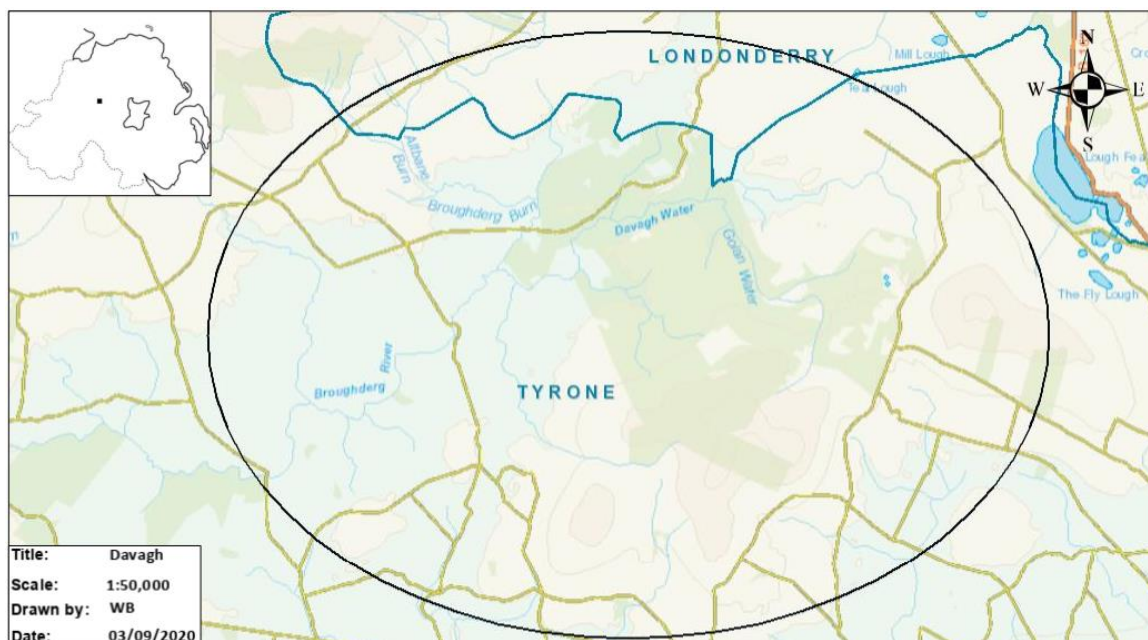


Figure 1: Map showing location of Davagh and approximate area being considered for WHS Status

What is a World Heritage Site?

Approved in 1972, the 'Convention concerning the Protection of the World's Cultural and Natural Heritage' was adopted by the United Nations Educational, Scientific and Cultural Organization (UNESCO) and came into force in 1976, when it had been ratified by twenty countries. It has since been ratified by 187 States Parties across the globe. The purpose of the Convention is to *'ensure the identification, protection, conservation, presentation and transmission to future generations of cultural and natural heritage of outstanding universal value'* (UNESCO, 2005a). The Convention states that the World Heritage Committee (WHC) should coordinate the process of designating these sites through a system known as inscription, which includes an evaluation of the resources by experts against a set of known criteria. The aim is to encourage conservation of the resources within the designated sites and surrounding buffer zones on a local level and also to foster a sense of collective global responsibility via international cooperation, exchange and support. Once designated, the States Party accepts responsibility for the effective management of the site and commits to adopting the 'Operational Guidelines for the Implementation of the World Heritage Convention' and the systems of reactive and periodic reporting set in place by UNESCO. If it fails to do this effectively then the threat of removal from the WHL is present, though it has not, to date, been exercised.

Sites may be nominated as cultural, natural or mixed criteria, with designation reliant upon the type of criteria that they are deemed to present in an exceptional form. The diversity of WHS is vast, ranging from Neolithic and medieval ruins on St Kilda and the Orkney archipelago, Stonehenge, and the Skellig Islands to castles, cathedrals and iconic buildings and structures such as Blenheim Palace, the Forth Bridge and Tower of London. Areas of cities have also been designated UNESCO Heritage sites such as the Old and New towns of Edinburgh and the Spa City of Bath, the Maritime Mercantile City of Liverpool and Maritime Greenwich. Geological phenomena such as the Giant's Causeway, the English Lake District and the North Devon and Dorset Coastlines are also now protected by heritage status.

Nominations are evaluated against a set of ten cultural and natural criteria that *"represent a masterpiece of human genius or to contain superlative natural phenomena; or areas of exceptional natural beauty and aesthetic importance; or to bear a unique or at least exceptional testimony to a cultural tradition or to a civilisation which is living or which has disappeared"* (UNESCO, 2005b).

Cultural sites can be:

- monuments (architectural works, works of monumental sculpture and painting, elements or structures of an archaeological nature, inscriptions, cave dwellings and combinations of features of outstanding universal value from the point of view of history, art or science),
- groups of buildings (groups of separate or connected buildings which, because of their architecture, homogeneity or their place in the landscape are of outstanding universal value from the point of view of history, art or science)
- sites (works of man or the combined works of nature and man, and areas including archaeological sites which are of outstanding universal value from the historical, aesthetic, ethnological or anthropological point of view) (See World Heritage Convention Article 1.)

Cultural landscapes are included in this category. (See Operational Guidelines 47, and Annex 3, 5- 13.) These represent 'combined works of man and nature' and are illustrative of the evolution of human society and settlement over time, under the influence of the physical constraints and opportunities presented by the natural environment and of successive social, economic and cultural forces. Cultural landscapes can reflect the interaction between humankind and its natural environment. They can include;

- clearly designed landscapes such as gardens and parklands
- organically evolved landscapes evolving from an initial social, economic, administrative and/or religious imperative which has developed in association with, and in response to, its natural environment
- associative cultural landscapes resulting from powerful religious, artistic or cultural associations.

Natural heritage is defined in the Convention as:

- natural features consisting of physical and biological formations or groups of such formations, which are of Outstanding Universal Value from the aesthetic or scientific point of view
- geological and physiographical formations and precisely delineated areas which constitute the habitat of threatened species of animals and plants of outstanding universal value from the point of view of science or conservation
- natural sites or precisely delineated natural areas of Outstanding Universal Value from the point of view of science, conservation or natural beauty

Mixed sites are sites which have Outstanding Universal Value for both cultural and natural heritage. Some cultural landscapes may also be mixed sites.

To be included on the World Heritage List, sites must qualify in three ways – they must meet one of the UNESCO’s selection criteria, show integrity and be adequately managed and protected (Figure 2). All three must be in place for a property to be judged to have Outstanding Universal Value, which is the final piece to the puzzle of becoming a World Heritage site. An ‘Outstanding Universal Value’ or OUV describes why the designated site is one of the most remarkable places on earth. Outstanding Universal Value means cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity. As such, the permanent protection of this heritage is of the highest importance to the international community as a whole.

The site also must meet at least one out of UNESCO’s ten selection (Table 1) criteria¹. These criteria are explained in the 2019 Operational Guidelines for the Implementation of the World Heritage Convention² which, besides the text of the Convention, is the main working tool on World Heritage. The criteria are regularly revised by the Committee to reflect the evolution of the World Heritage concept itself.

¹ <http://whc.unesco.org/en/criteria/>

² <https://whc.unesco.org/en/guidelines/>

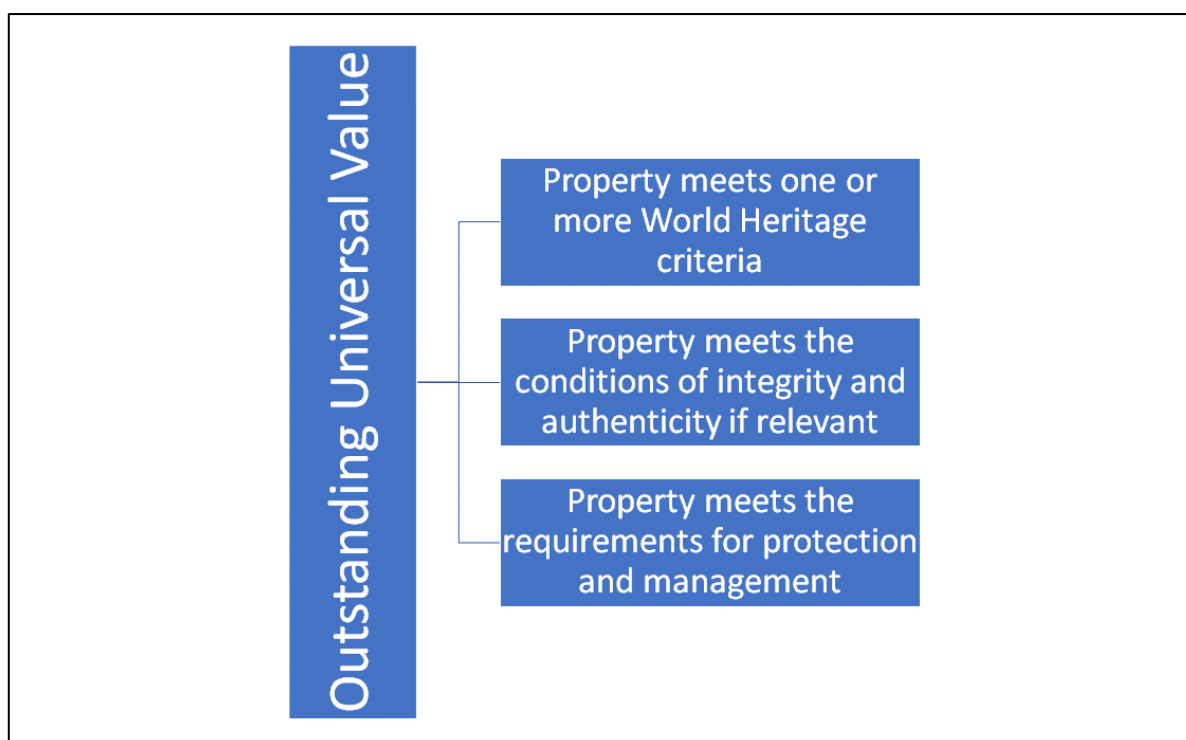


Figure 2: Factors required to be included on the World Heritage list

Table 1: Selection criteria for World Heritage Site status	
i	To represent a masterpiece of human creative genius
ii	To exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design
iii	To bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared
iv	To be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history
v	To be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change
vi	To be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance. (The Committee considers that this criterion should preferably be used in conjunction with other criteria)
vii	To contain superlative natural phenomena or areas of exceptional natural beauty and aesthetic importance
viii	To be outstanding examples representing major stages of earth's history, including the record of life, significant on-going geological processes in the development of landforms, or significant geomorphic or physiographic features
ix	To be outstanding examples representing significant on-going ecological and biological processes in the evolution and development of terrestrial, fresh water, coastal and marine ecosystems and communities of plants and animals
x	To contain the most important and significant natural habitats for in-situ conservation of biological diversity, including those containing threatened species of outstanding universal value from the point of view of science or conservation

How are WHS designated?

The UK Government's Department of Digital, Culture, Media and Sport (DCMS) is the body who establish a call for applications for new candidates to join the UK's World Heritage Tentative List by seeking applications from Local Authorities, State Bodies, community organisations and individuals, for sites or properties of natural and/or cultural heritage which are considered to be of outstanding universal value (OUV). They also oversee the process of Tentative List application and assessment. The Tentative List format includes:

- The name of the property/site
- The geographical location of the property/site
- A brief description of the property/site
- A justification of its outstanding universal value in accordance with the criteria and with the conditions of authenticity or integrity as set out in the Operational Guidelines.

The last Tentative List of The United Kingdom of Great Britain and Northern Ireland was published in 2010 and this is likely to be reviewed in 2021/2022.

The DCMS **may only nominate a maximum of one site per year from this list**, and the UK government will only submit nominations which clearly demonstrate that a site meets the criteria, authenticity, integrity and management required.

Along with one of the ten criteria, a location needs to be deemed that it has outstanding universal value. Although important to the local region, the attraction needs to prove significant across the globe. UNESCO sets the standard high, with a location that can "transcend national boundaries." A place that is memorable in the modern day, but also years, decades, and centuries down the road.

Once a site has been selected from the Tentative List, the nomination document can be prepared. This outlines the criteria for inscription, boundaries of the site and buffer zone (area immediately surrounding the resource) and as much detail as possible relating to the uniqueness and importance of the site resource. In addition, a Management Plan must be presented to demonstrate how the integrity of the site and its universal value are to be presented, covering aspects such as transport, conservation and tourism activity. Advice is available from the World Heritage Centre and advisory bodies, such as ICOMOS-UK and IUCN-UK prior to this submission.

The World Heritage Centre then arranges for the nomination to be independently evaluated by an expert representative from either one or both of the two Advisory Bodies mandated by the WHC: the International Council on Monuments and Sites (ICOMOS) and the International Union for the Conservation of Nature and Natural Resources (IUCN), which respectively provide evaluations of the cultural and natural sites nominated. A third advisory body, that of the International Centre for the Study of the Preservation and Restoration of Cultural Property (ICCROM), an intergovernmental organisation, provides the Committee with expert advice on the conservation of cultural sites and training activities.

Mission reports relating to conservation and management, reports on the cultural/scientific values, and consultations with specialists are used to produce detailed recommendations on a site. These are then studied by special panels of the respective Advisory Bodies and at these meetings recommendations are formulated which are later presented to the World Heritage Committee. The options are to recommend inscription, deferral (to seek further detail) or reject the nomination.

The final step is for the formal inscription of the site as a WHS and committing it to being managed in accordance with the Operational Guidelines for the Implementation of the World Heritage Convention.

Once moved from the tentative list to the World Heritage List and registered as a World Heritage Site, it is not the end for that location. The state who submitted the site needs to monitor the location. Every six years the sites are assessed to make sure they still qualify to be preserved and continue to earn the distinction. The process is illustrated in Figure 3.

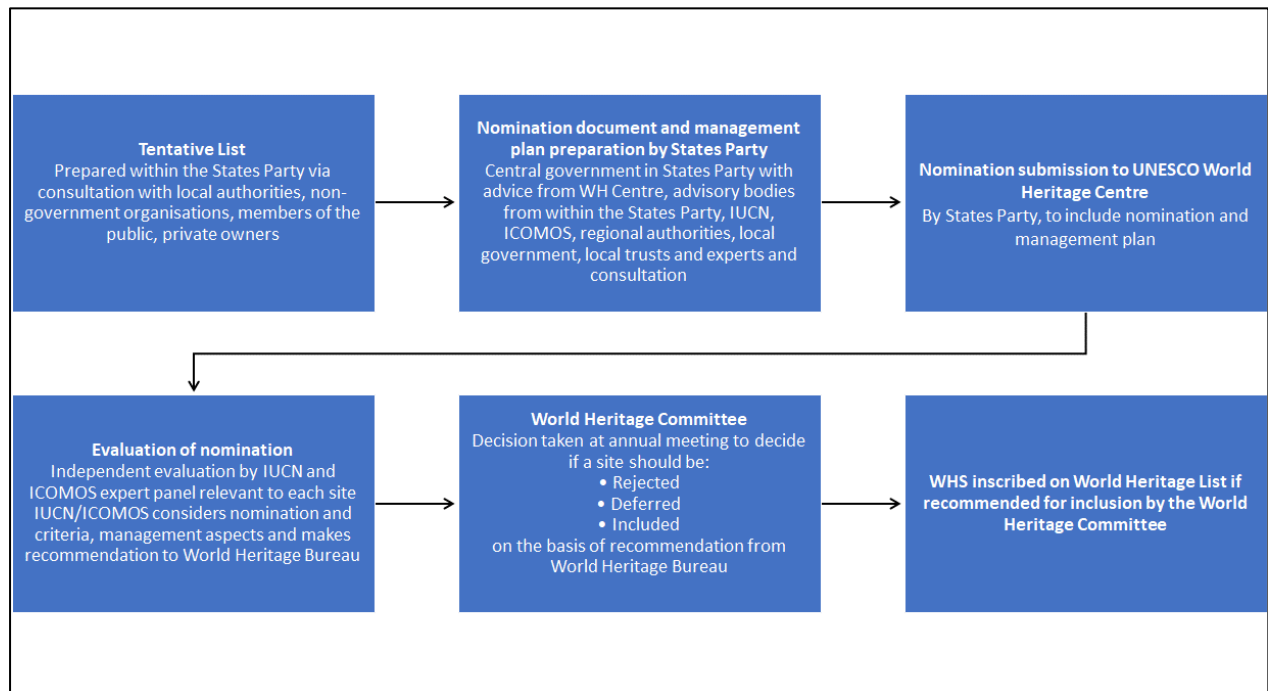


Figure 3: World Heritage Site inscription process

Does the Davagh Dark Skies project meet the criteria?

In an announcement concerning dark skies and celestial objects, the UNESCO World Heritage Centre made a statement in 2007 underlining **that the sky or the dark night sky or celestial objects or starlight as such cannot be nominated to the World Heritage List within the framework of the Convention concerning the Protection of the World Cultural and Natural Heritage**. Further, the World Heritage Centre went on to underline that a parallel ‘Starlight’ Initiative developed by a group of international experts was not part of the UNESCO Thematic Initiative “Astronomy and World Heritage”. Subsequently, neither Starlight Reserves, nor Dark Sky Parks can be recognised by the World Heritage Committee as specific types or categories of World Heritage cultural and natural properties since no criteria exist for considering them under the World Heritage Convention. However, in their second Thematic Study (2017) they have considered dark sky qualities in detail, concluding that, while dark sky places cannot, in themselves, be recognised as specific types or categories of World Heritage property, either cultural or natural, *“dark sky values can nonetheless enhance either the natural or cultural value of a place (or both), and in this sense contribute to potential OUV”*³.

³ <https://www3.astronomicalheritage.net/thematic-study-2>

What can we do to make Davagh eligible?

Davagh as a dark sky project is not enough to attain WHS accreditation so how can we apply the UNESCO World Heritage Criteria to the officially designated Davagh International Dark Sky Park? After reviewing a range of case studies, pertinent literature and assessing the wider landscape heritage assets of the Davagh region it is viable to develop a framework that can incorporate the cultural narrative of astronomy, archaeology, biodiversity, settlement and place into a story of landscape evolution in line with sub-terrestrial, terrestrial and celestial connected 'spacetime' as described by Tim Robinson in *"Setting Foot on the Shores of Connemara"* (1996). To elaborate, the basic features of the Dark Sky Park concept are:

- The sky itself (object of the observation),
- The site as a property in local permanent context (geography, atmosphere, architecture, landscape, nature etc)
- Humankind using the observation place eventually with artefacts/instruments.

Of course, these three basic aspects of the sky observation are intimately related, but they do not align with the World Heritage view. However, the Dark Sky Park does have a series of natural and cultural attributes supporting and expressing its value - Dark Sky quality is a natural attribute of the place among others with visible relationships with the landscape and the assets it hosts.

When considering the Dark Sky project among a cluster of natural attributes, the Dark Sky quality contributes to the global natural context of a giving place and it belongs to a larger group of natural attributes of the site, forming its natural environment components. Subsequently one of the best ways to use the Dark Sky value is among a set of other remarkable attributes, making a generally remarkable landscape at the turn of night and day. Further, when considering the Dark Sky among a cluster of cultural attributes or mixed attributes, the Dark sky quality could be considered as a cultural asset in context of the history of the observatory place; the remarkable atmosphere quality and the 6000 year plus settlement and celestial history of the region.

Subsequently, it is feasible for us to consider the Dark Sky Park at a landscape scale, and include the archaeology of Davagh, Beaghmore and Broughderg as being creative acts, a response to a sense of place and balance between earth and sky. The creation of this prehistoric landscape has provided a focus and an index of human continuity and community since prehistoric times. There is a lived richness of place-names, ecology, archaeology, astronomy and cultural history and they cannot be separated here. Combining this with the geological and geomorphological importance of the region and alongside the global importance of the extensive peatland setting, it can be argued that the site meets the following WHS selection criteria as outlined in Table 1:

- i. To represent a masterpiece of human creative genius
- ii. To exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design
- iv. To be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history
- v. To be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change

These are discussed below.

Selection Criteria 1: To represent a masterpiece of human creative genius

Davagh in combination with the wider landscape setting of Beaghmore and Broughderg represents a temporal continuum of societal and cultural interaction with the celestial sky that extends from the late Neolithic through to the modern day. The creativity of historic communities in linking the terrestrial setting of the Sperrin foothills with not only our celestial sun and moon neighbours but the wider astronomical heavens through stone alignments, circles and burial structures is evident throughout the landscape and has now transitioned into an internationally recognised Dark Sky Park. Representative of being possibly the first 'observatories', these structures reflect the societal creativity of ancient communities and their sense of place within an evolving landscape during a time of climatic fluctuation, the result of which being the formation of the expansive stretches of peatland in which they are set. These sites stand as a tribute to the complexity and diversity of ways in which people rationalised the cosmos and framed their actions in accordance with that understanding. This includes, but is by no means restricted to, the development of modern scientific astronomy which has culminated in the Davagh Dark Skies project. This close and perpetual interaction between Neolithic and early Bronze Age astronomical knowledge and its role within human culture is a vital element of the outstanding universal value of this proposal.

Selection Criteria 2: To exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design

The Davagh proposal exhibits an important interchange of human values during the development of monumental architecture of major ceremonial complexes related to astronomical landscapes in the British Isles, Ireland and northwest Europe. This complex shows a planned, designed landscape as opposed to a purely functionally evolved one as in a farming landscape. It is art of a monumental scale that we still do not know the size and limits of. The landscape is not 'finished' - there is so much more to find out at a sub peat level.

Selection Criteria 4: To be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history

This proposal sits within major technological achievements as to how people have understood the phenomena in the sky, how they used these phenomena and what role the sky played in their culture. The whole landscape is one huge technological ensemble of remarkable complexity that illustrates thanks to the peatland cover the significant stages in human history.

Selection Criteria 5: To be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change

This sub-terrestrial, terrestrial and celestial connected landscape is an example 'par excellence' of human interaction with the environment that is vulnerable under the impact of climate change and which has profound lessons for humanity, some yet to be discovered. This is "a common good that belongs to each of us regardless of nationality." The unique mix of ecology, archaeology and astronomy make this an outstanding example of traditional human settlement and culture. The creation of this prehistoric landscape has provided a focus and an index of human continuity and community since prehistoric times.

Consideration of Davagh Dark Skies under UNESCO Biosphere Reserve (BR) Status

As an alternative to the competitive and challenging WHS designation it may also be possible to consider the Davagh site as a Biosphere Reserve. Biosphere Reserves are all about improving the relationship between people and their local environment, globally. They are sites created by UNESCO that find creative ways for people and nature to thrive together. They act as extraordinary testing grounds to put into practice a revolutionary approach to managing our ecosystems sustainably for future generations.” (UNESCO) Biosphere Reserves UNESCO launched Biosphere Reserves (BR) in 1976 as a contribution to the Man and Biosphere Programme (MAB) objective of achieving a balance between conserving biological diversity, promoting economic development, and maintaining associated cultural values. BRs are intended to provide a means of testing, refining, demonstrating, and implementing this objective (UNESCO, 1995). Biosphere reserves are ‘learning places for sustainable development’. They are sites for testing interdisciplinary approaches to understanding and managing changes and interactions between social and ecological systems, including conflict prevention and management of biodiversity. They are places that provide local solutions to global challenges. Biosphere reserves include terrestrial, marine and coastal ecosystems. Each site promotes solutions reconciling the conservation of biodiversity with its sustainable use.

As with WHS, states nominate their chosen sites which are then assessed against standard criteria and conditions before they are eligible to be listed as part of the BR network. Biosphere Reserves involve local communities and all interested stakeholders in planning and management. They integrate three main "functions":

- Conservation of biodiversity and cultural diversity
- Economic development that is socio-culturally and environmentally sustainable
- Logistic support, underpinning development through research, monitoring, education and training

To assist in achieving these complex objectives reserves should be structured into core protected areas, buffer zones, and a transition or co-operation area. Buffer zones include sustainable management activities compatible with the needs of the core area and including sustainable tourism and recreation. The transition area can include a wide range of economic activities and human settlements. The aim here is to develop these in a sustainable way that is linked to, and compatible with, the rest of the reserve. The Seville strategy (UNESCO, 1995) identified four objectives for BR: to conserve natural and cultural diversity, to provide models of land management and sustainable development, to provide for research, monitoring, education and training, and to strengthen the BR network itself. Under each main objective the strategy lists several more specific objectives and actions, and indicates whether the latter apply at international, national, or reserve level. Section 18.2 of the strategy lists reserve level activities or objectives that are most relevant for this study. The Seville+5 review of BRs (UNESCO, 2001) identified some additional initiatives that would improve the effectiveness of the network and its reserves. In particular, the concept of “quality economies” was introduced, which deals with the potential of branding and marketing, and the need for a stronger socio-economic perspective on BRs.

Does the Davagh Dark Skies project meet the BR criteria?

As with Davagh as a dark sky project alone, not being enough to attain WHS accreditation, so too, is it with the Biosphere Reserve status designation. However, we could apply the UNESCO Biosphere Reserve status to the wider landscape concentrating on the peatlands and water systems with the establishment of core protected areas, buffer zones and a transition or co-operation area. This status

is very suitable to peatland areas and areas with little light pollution with 'leaky boundaries. The emphasis would be more on the peatlands and the associated cultural landscape. The world consists of many different ecosystems, and in every one of them, people have learned how to live in harmony with their environment for generations. The role of a Biosphere Reserve is to uncover this knowledge, to use it, and to adapt it for the future. The Davagh landscape is a classic example of an outdoor teaching laboratory of human settlement, ecology, archaeology and astronomy that can help teach and improve the relationship between people and their local environment at a global scale due to its unique landscape terrestrial and celestial mix.

Incorporation of the peatlands surrounding the Davagh area also contribute to the more a subtle theme referenced in modern Irish history, extending to political and cultural issues as well as permeating social and economic ones. There is a picture richer in detail and more complex in its development than traditional images of the "bog" would suggest. This is timely, given the current political and environmental debates, and it is original in that bog study is truly cross-disciplinary and totally interconnected. Further, Blanket bogs have appeared on the WHS tentative list for Scotland at The Flow Country in Caithness and Sutherland⁴ and indeed a sub-peat archaeology of a farming landscape at the The Céide Fields and North West Mayo Boglands is on the Republic of Ireland's tentative list. What makes this proposal unique is the addition of astronomy and celestial landscapes to the mix.

Peatlands invite a whole academy of sciences to their study, but the cultural element is often neglected. You cannot have one without the other. If we add the threatened ecology of bogs to the resources of literature, archaeology, and other elements of culture the possibilities are limitless for their survival. The arts and sciences do not meet often enough. There are few other substances that can join the built, natural, and cultural elements of our heritage as much as our bogs. Joseph Beuys, one of the world's most influential post-war avant-garde artists described our bogs as, "the liveliest elements in the European landscape, not just from the point of view of flora, fauna, birds and animals, but as storing pieces of life, mystery and chemical change, preservers of ancient history." These contentious terrains can throw a light on the past and help us look to future.

The social, economic and environmental benefits of World Heritage Sites and Biosphere Reserve status

As previously noted, UNESCO designations are granted to sites satisfying several criteria and are intended to contribute towards a series of economic, social and environmental objectives relating to sustainable development. Evaluation of the impact, efficiency and effectiveness of designations can contribute to their utility and is increasingly promoted by various bodies. For the purposes of this report, we have drawn on the literature and previous studies to generate a broad assessment framework that comprise eight high level categories of potential environmental and social benefit of designation:

- Environment - Biodiversity / Climate change mitigation; Landscape / greenspace / light pollution; Ecosystem services
- Economy – Employment and income; Business opportunity
- Social – Social inclusion; Health and well-being; Education and training

⁴ <https://www.nature.scot/green-light-peatlands-partnership-apply-unesco-world-heritage-site-status>

In summary, there is little hard evidence in the literature about the benefits of UNESCO sites. Some work has been done around the world, often focusing on tourism benefits. None of this indicates how much benefit the designation itself generates compared with the role of the underlying heritage resources. Previous research has shown that some benefits are relatively well-evidenced for some sites – including World Heritage Site status as a catalyst for more effective conservation, partnership working, civic pride, social capital, learning and education and additional funding and investment. But the existing body of research suggests the tourism and economic development impacts are limited or that the existing evidence base does not justify some of the claims made of WHS status.

However, previous research methodologies have failed to do justice to the complexities of World Heritage Sites; tending to ignore the differing motivations and actions of sites. This has resulted in a body of research that has shown some sites that have achieved a range of socio-economic impacts but offered no framework for understanding why or how these were achieved in some places and not others. More evidence is available about the influence of the designations on governance processes. UNESCO guidelines encourage participation by a wide range of stakeholders, and this seems to have been put into effect at sites in many countries. Nonetheless, many of the sites appear to deliver four key benefits⁵:

- Enhanced leverage to pull in funding for a wide range of purposes
- Stimulus to awareness raising and educational initiatives
- Enhanced tourism image and profile
- Enhanced opportunities for niche branding of local products and services.

However, weighing-up the relative costs and benefits associated with any UNESCO designation is a difficult task since identification and quantification are hindered by several factors. First, the objectives of a designation may be described in terms of processes and outputs rather than outcomes. It may be possible to translate them into outcome benefits, but for practical reasons it may be better for the evaluation to focus on the effectiveness and efficiency of achievement of the stated objectives.

Second, economic, social and environmental systems tend to be dynamic rather than static in nature and have complex spatial linkages, that is, cause and effect may be separated by distance in both time and space, and to evolve over time. Third, scientific data and understanding of systems and sites is rarely complete. We still do not know the extent of this sub peat archaeological and celestial landscape. In other words, the data available, and models derived from it, may fail to capture true relationships and situation adequately. Fourth, concerns about system complexity and an understandable desire to measure more easily observable results, may have led to monitoring that is directed towards aspects of the designation or compliance process rather than actual outcomes.

Fifth, evaluation entails careful consideration of “additionality” – what would have happened in the absence of the designation? To put it another way, as the flip-side of the opportunity cost coin, what additional benefits have been gained? As with chances forgone, benefits gained can be difficult to discern – especially if the possibility of “displacement” from other sites is considered. For example, income generated within a designated site may merely be at the expense of income lost from neighbouring areas. Finally, even if cost and benefit categories can be identified and measured it is still difficult to compare and aggregate across categories. It may be unacceptable to use the same yardstick to compare certain factors, or even to compare them at all.

⁵ <http://icomos.fa.utl.pt/documentos/2009/WHSTheEconomicGainFinalReport.pdf>

Conclusions

Mid Ulster District Council's proposal to have Davagh Dark Sky Park officially designated a UNESCO World Heritage Site is ambitious and should be highly commended for both its vision and ambition. However, the challenges to be faced in achieving the designation are technically complex, time consuming and will certainly require a high degree of flexibility in establishing the underlying framework goals to meet the designating criteria set out by UNESCO.

One of the most critical decisions that Council will have to make relates to the designating feature. UNESCO have clearly stated that dark skies cannot be nominated to the World Heritage List within the existing framework of the Convention concerning the Protection of the World Cultural and Natural Heritage. This, however, does not mean that the site cannot progress. In this scoping report we have reviewed the criteria and believe that an amendment to the initial proposal made by Council that gives consideration to the Davagh Dark Sky Park as a wider "in combination" bid that incorporates archaeology and peatland at a landscape scale would allow for progression to the Tentative List. In doing so, it is feasible for us to consider the Dark Sky Park as a palimpsest of attributes that include the archaeology of Davagh, Beaghmore and Broughderg as being creative acts and a response to a sense of place and balance between earth and sky. The context of a prehistoric landscape provides a focus and an index of human continuity and community since prehistoric times resulting in a lived richness of place-names, ecology, archaeology, astronomy and cultural history that cannot be separated. Combining this with the geological and geomorphological importance of the region and alongside the global importance of the extensive peatland setting, it can therefore be argued that the site meets the following WHS selection criteria:

- To represent a masterpiece of human creative genius
- To exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design
- To be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history
- To be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change

A second factor to consider is the challenge of getting onto the Tentative List. Competition for a place on the list is significant and the assessment criteria are robust. Despite this, we believe that if the Dark Skies project is considered in combination with the wider landscape attributes cited above there is every possibility that the proposal could progress. It is also very important to remember that the Department of Digital, Culture, Media and Sport can only nominate one site per year from the Tentative List to the World Heritage List so successful designation is likely to take a significant length of time.

The resources required to progress a successful bid are difficult to quantify but can be significant. Apart from the development of relevant reports, management plans and monitoring documentation there is also a need to put in place integrated communication methodologies to accommodate partnership development, governance arrangements, community engagement and sustainability plans.

Despite the challenges, we see this as a feasible venture for Council that should be investigated further



Department for Digital, Culture, Media & Sport

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29 September 2020

Ms Charmain Bell
Charmain.Bell@midulstercouncil.org

Our Ref:
TO2020/17221/NB

Dear Ms Bell,

Thank you for your email of 17 August, regarding your interest in pursuing the nomination of a site for World Heritage inscription. I am replying as a member of the Ministerial Support Team. I apologise sincerely for the lengthy delay in your receiving a reply.

DCMS act on behalf of the UK as a state party to the World Heritage Convention, and is responsible for nominating new sites for inscription by the World Heritage Committee. Each state party may only nominate a maximum of one new site per year. Most recently, the Jodrell Bank Observatory was inscribed as the UK's 32nd World Heritage Site in 2019.

The development of nominations and the management of sites is largely undertaken at local level, and must include commitments to protect the site. Inscription, if properly planned for and leveraged, can bring benefits such as increased tourism and international awareness.

The first step to achieving World Heritage inscription is for a site to be included on the UK's tentative list of sites. This list is periodically reviewed by the government, typically every 10 years. To be considered for the tentative list, a site must have the potential to demonstrate outstanding universal value, authenticity and integrity, as set out in the convention. When the next review of the tentative list is initiated, guidelines will be published with further information for prospective sites. As yet, the scope of this review and timeframes for its completion have not been set. We will endeavour to keep you informed with any updates.

I hope this information is helpful.

Yours sincerely,

Neil Bedi
Ministerial Support Team

