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Francesco Bandarin
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Your Ref
Our Ref

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Dear Dr Bandarin

Withdrawal of UK 2006 Nomination – Darwin at Downe

On behalf of the United Kingdom of Great Britain and Northern Ireland, I am writing formally to withdraw the UK's 2006 nomination, Darwin at Downe, from the 31st Session of the World Heritage Committee this year with a view to re-submitting a revised nomination at a later date.

While the UK government remains convinced that Darwin at Downe, which is supported by ICOMOS-UK, fully justifies inscription on the World Heritage List, we do not think that the site could be objectively assessed by members of the World Heritage Committee in the light of the ICOMOS evaluation which we consider to have serious weaknesses and omissions.

While ICOMOS have noted in their evaluation the Committee's call in 2005 for '*nominations which recognises and celebrate achievements in science*', it is our view that insufficient thought has been given to how this might be achieved within the terms of the World Heritage Convention. We believe that the evaluation of Darwin at Downe shows up significant problems in this area which need to be resolved by the Committee. Our key concerns are set out in more detail at **Annex A** to this letter for your consideration and I would be grateful for your views.

We note too, with concern, that the views of IUCN have not been summarised in the report. Since one of the issues which should be covered by IUCN in dealing with cultural landscapes is '*historically significant discoveries*' (Operational Guidelines, Annex 6, paragraph 16 (vii)), we think that this too is a failure in the evaluation process and would therefore be extremely grateful to see the evaluation prepared by IUCN.

However, to underline our commitment to Darwin at Downe and to support the Committee's express desire to increase representation of sites of scientific interest on the World Heritage List, the United Kingdom offers to host and fund, on behalf of UNESCO, an international expert meeting in the latter part of this year or early in 2008 to examine the issues of representing science on the World Heritage List.



Our view is that such a meeting could report back to the 32nd Session of the Committee in the summer of 2008 so that the Committee could then agree on guidelines for treatment of scientific sites, as it has done in the past for cultural landscapes and canals, for example. We believe that without this work, sites of scientific interest will continue to be omitted from the World Heritage List simply because the criteria, as currently interpreted and understood, do not allow for key factors to be considered – as demonstrated in the Darwin case.

We would be most grateful if the UK's offer of an international expert meeting on the lines outlined above could be brought to the attention of the Committee during its meeting in Christchurch this year. It is very much our intention through this work to enrich the evaluation process for all potential sites of scientific interest as well as to enable us to re-present the Darwin at Downe nomination in the future.

Please let me know if you require any further information.

I look forward to hearing from you.

Mandy Barrie

Architecture and Historic Environment Division
Department for Culture, Media & Sport

CC: H.E Mr Peter Landymore, UK Permanent Delegate to UNESCO
UK UNESCO National Commission
ICOMOS
IUCN
English Heritage
Councillor Stephen Carr, Leader of Bromley Council

Annex A

ICOMOS Evaluation: Darwin at Downe (United kingdom) No 1247. Response by the UK State Party

Introduction

1. The UK government has grave concerns about the credibility of the ICOMOS evaluation (No 1247) of the UK's 2006 nomination, Darwin at Downe, for inscription on the World Heritage List.
2. The UK nominated Darwin at Downe in 2006 in response to The World Heritage Committee's call in 2005 for 'nominations which recognise and celebrate achievements in science'. The ICOMOS evaluation has questioned the outstanding universal value, authenticity and integrity of the nominated site, and so recommended the rejection of the site. However, we have major doubts about the evaluation and ICOMOS's application of World Heritage criteria to the site as a site for the heritage of science. Our concerns on these issues are set in turn below, following the order of the evaluation report.

Key Concerns

Integrity

3. Integrity is covered in the Operational Guidelines paragraphs 88 and 89. A property is assessed to establish the extent to which it:
 - (a) includes all elements necessary to express its outstanding universal value;
 - (b) is of adequate size to ensure the complete representation of the features and processes which convey the site's significance;
 - (c) suffers from adverse effects of development and/or neglect.
4. For cultural properties it is also expected that the physical fabric of the property and its significant features should be in good condition, that the impact of deterioration processes is controlled, that a significant proportion of the elements necessary to convey the totality of the value of the property is included, and that the relationships and dynamic functions present in cultural landscapes essential to their distinctive character should be maintained.
5. ICOMOS report 'that *the boundaries of the core zone are adequate*', thereby accepting that the nominated site is of sufficient size to meet the conditions of integrity. They appear to accept that the site is in good condition though they have questioned the degree of restoration of Down House and its garden, as noted below. In its assessment of integrity, ICOMOS say that '*the landscape remains substantially unchanged since Darwin's time*' while noting as adverse impacts a row of electricity pylons, the parking of cars on the road at Downe at busy times, and the '*low noise of aircraft*'. None of these are major and the survival of the landscape so well and so close to London is remarkable.

6. ICOMOS's assessment of integrity does not justify the statement in their conclusion that *'the landscape around the house has undergone substantial changes in use, and hence of appearance, since the second half of the nineteenth century and so it is by no means the landscape that aided Darwin in his studies.'* Apart from being untrue, this statement directly contradicts the more detailed assessment made by ICOMOS earlier in the evaluation.

Authenticity

7. Authenticity is covered in the Operational Guidelines, paragraphs 79 – 86. ICOMOS question the extent to which the site is authentic because of the degree of restoration of Down House and the gardens. It is difficult to understand the grounds on which they do so. The structure, layout and features of the house, the greenhouses and the basic structure of the gardens are all as left by Darwin. The bulk of the contents are original, particularly in the key rooms such as Darwin's study. All that has been done is to re-order and re-decorate the house as it was in Darwin's day. This has been carried out, as ICOMOS has recognised, in accordance with meticulous research. In our view, this falls clearly within the remit of paragraph 86 of the Operational Guidelines that *'reconstruction is acceptable only on the basis of complete documentation and to no extent on conjecture'*. This is exactly what has happened on many other World Heritage Sites and in most houses devoted to the memory of an individual since it is extremely rare for a house and its contents to be preserved without break exactly as it was when a great man died. We believe therefore that ICOMOS's questioning of authenticity is unfounded.

Outstanding Universal Value

8. The nomination was proposed for inscription under cultural criteria (iii) and (vi) as set out in Section IID of the Operational Guidelines for the Implementation of the World Heritage Convention (WHC.05/2. 1 February 2005). ICOMOS claim the State Party has justified the use of criterion (iii) *'on the basis that Darwin's theory of evolution by natural selection stands as one of the supreme scientific achievements'*. They consider *'that criterion (iii) is used when properties bear testimony to a cultural tradition or a civilisation'* and that relating it to scientific discoveries *'would be a new interpretation with far-reaching implications'*. This is certainly true.
9. However, the case for criterion (iii) put forward by the State Party is that the cultural tradition evidenced here is not Darwin's discovery but the tradition of scientific investigation and deduction based on experiment and the assessment. This is clearly set out in the Nomination:

The living cultural tradition is the approach of modern science to the understanding of the natural world by observation, hypothesis, experiment, free and wide exchange of information and ideas, theory building and communication (Nomination Document, Section 3a, 3).

10. The Nomination has therefore used criterion (iii) in exactly the way in which ICOMOS says it should be used. Its application to this property is because the physical evidence of Darwin's observations and experiments survive so well so that his application of the cultural tradition of scientific investigation is clearly evidenced by the physical evidence of the nominated site. The site therefore provides very obviously an example of the tradition and philosophy of scientific investigation which has underpinned western society

and development since the Renaissance. We continue to believe that the use of criterion (iii) is entirely justified on the basis on which it was put forward.

11. ICOMOS's failure to understand this basis means that they have not assessed the extent to which the physical evidence of Darwin's work does exemplify the tradition of scientific investigation. They note that '*his house and grounds contain many features which he created and used in his scientific work there*' and also that '*the surrounding area preserves the main features of the farmed and wooded landscape ... which he used for his natural history in many ways*'.
12. With regard to the use of criterion (vi), ICOMOS have merely said that the use of this criterion is not justified while recognising that the intellectual significance of the property and of Charles Darwin are not in question and asserting that the importance of the property lies in its educational rather than its heritage context. They do not explain why they have taken this view and as a consequence their statements are unsupported and unsubstantiated. We believe that this shows a lack of rigour which is totally unacceptable, and that their failure to justify assertions such as this openly and transparently is a matter which the Committee needs to take up with them in the context of their role as an advisory body.

Conclusion

13. The UK government cannot therefore accept the conclusions reached by ICOMOS which are, in many cases, not substantiated by their own statements elsewhere in the text. Other statements, particularly with regard to authenticity, appear not to be in conformity with the Operational Guidelines or with ICOMOS's own views on other sites where considerable degrees of restoration have been accepted.
14. We note too, with deep concern, that the views of IUCN have not been summarised in the report. Since one of the issues which should be covered by IUCN in dealing with cultural landscapes is '*historically significant discoveries*' (Operational Guidelines, Annex 6, paragraph 16 (vii)). We think that this too is a failure in the evaluation process.
15. Overall, we remain convinced that the Darwin at Downe nominated site has outstanding universal value and that the ICOMOS evaluation is fundamentally flawed for the reasons set out above. More seriously we consider that this is linked to a general failing on the part of ICOMOS to think through how the concepts of outstanding universal value as set out in the World Heritage Convention should be applied to the World Heritage Committee's call for '*nominations which recognises and celebrate achievements in science*'.
16. As happened in the past with cultural landscapes and some aspects of industrial archaeology, the challenge of new concepts requires new thinking and consideration which we do not think can be done by ICOMOS alone. We note for example that their 28 International Scientific Committees, meant to focus and develop specific areas of their work do not include any that deal with the issues of how the heritage of science can be recognised in physical sites capable of being put on the World Heritage List.
17. We think therefore that it would be helpful to hold an international expert meeting under the auspices of the World Heritage Committee. The purpose of such a meeting would be to examine how sites recognising and celebrating achievements in science can be recognised under the World Heritage Convention, and to recommend appropriate

guidelines on this issue for consideration by the World Heritage Committee so as to give effect to its own stated aspirations. Such an expert meeting would clearly need to involve international experts in the history of science and scientific traditions as well as the World Heritage Committee, the World Heritage Centre and the Advisory Bodies.

18. In view of the significance of this issue to the implementation of the World Heritage Convention and also of the Committee's wishes, the United Kingdom is prepared to host and fund such an international expert meeting in the latter part of this year or early in 2008 so that its outcomes may be reported to the 32nd session of the Committee in the summer of 2008.

Department for Culture, Media and Sport
June 2007