

# What was Unesco up to in Liverpool?

In July Liverpool became only the third place to lose its world heritage status. Ian Wray and Dave Chetwyn, both based in the city, reflect on what happened there and why.



Liverpool's waterfront: the Lexington Tower is behind the cruise-liner funnel and to the right. Other tall buildings are in the 1960s city centre plan office expansion zone (Photo: Liverpool City Council)

## A city is not a museum

*Ian Wray writes:* On 7 July 2004 'Liverpool – Maritime Mercantile City', with much civic celebration, was inscribed in the list of Unesco world heritage sites. Only 17 years on, Unesco has removed the status, claiming that irretrievable damage has been caused to the site's outstanding universal value by new developments. Liverpool's recently elected new city mayor Joanne Anderson (Britain's first black woman city mayor) had campaigned vigorously for retaining the world heritage site, to no avail. It is an incredibly sad loss, not just for Liverpool, but for the UK as whole, for the Liverpool site was part of Britain's national cultural heritage, not just Liverpool's. Indeed, it is a serious blow for the wider conservation movement.

*What was the basis for designating Liverpool as a world heritage site?*

The site was designated on the basis of the initial statement of outstanding universal value, reflecting the city's pivotal role in world history. Views and townscape were not mentioned, and there was only one reference to architecture: 'the minor detailing of architecture such as original pulleys!...' Liverpool's global significance rested on the development of innovative port technologies, the building up of the British empire, the abhorrent slave trade, and Liverpool's global and cultural trading connections. However, not long after inscription (and without public consultation) the statement of outstanding universal value was amended by Unesco to place emphasis

on structures, architecture, buildings – and thus 'views' – rather than culture and history<sup>2</sup>. Thus the apparently immutable statement of outstanding universal value was reconfigured by heritage experts.

*Who is responsible for protecting the UK's world heritage?*

The UK government is responsible, as the relevant 'state party' and signatory to the Unesco World Heritage Convention. The convention is clear about the government's responsibilities, setting out the duties of state parties in identifying potential sites and their role in protecting and conserving them: 'By signing the convention, each country pledges to conserve not only the world heritage sites situated on its territory, but also to protect its national heritage. The state parties are encouraged to integrate the protection of the cultural and natural heritage into regional planning programmes, set up staff and services at their sites, undertake scientific and technical conservation research, and adopt measures which give this heritage a function in the day-to-day life of the community'<sup>3</sup>.

*Why was Unesco so concerned about Liverpool?*

It had two concerns, both relating entirely to the derelict and disused North Docks, which are partly in the site and partly in the 'buffer zone' around the site. The first concern was the outline planning permission for Liverpool Waters, which included proposals for tall buildings on the waterfront. All of these proposed tall buildings

## References

<sup>1</sup> The inscription statement can be found in the Appendix of Liverpool World Heritage City (2014), ed Peter de Figueiredo, Liverpool: Bluecoat Press.

<sup>2</sup> The author is not aware who instigated and drafted the changes, but presumably both English Heritage and Unesco officials were involved.

<sup>3</sup> The 1972 World Heritage Convention <https://whc.unesco.org/en/convention/>

## References

<sup>4</sup> However, the consent was issued much later owing to the need to prepare a legal (Section 106) agreement.

<sup>5</sup> Liverpool Waters is described, together with other projects, in a book outlining the 'Ocean Gateway' strategy, issued by Peel Holdings in September 2008.

<sup>6</sup> Report of the Joint World Heritage Centre/ ICOMOS Mission, Liverpool Maritime Mercantile City, UK, 24–25 February 2015, Giancarlo Barbato and Michael Turner

were in the buffer zone, not the world heritage site. The second concern was the proposal for the new Everton stadium on the waterfront at the Bramley Moore Dock.

### *What is Liverpool Waters?*

Liverpool Waters is an outline planning permission for a large-scale speculative development submitted by Peel Holdings, which owns the North Docks. Permission was given by the city council in March 2012<sup>4</sup>. The secretary of state for communities and local government considered whether to call in the application for his consideration and a possible public inquiry, but decided not to do so, effectively giving the green light to the development. Initially conceived before the 2008 financial crash<sup>5</sup>, to date virtually nothing has been built to implement that permission, in terms of buildings constructed on the ground. Proposals now coming forward are generally modest, some of only two or three storeys.

### *How many tall buildings have been built in Liverpool Waters?*

None has been built. The only new tall building constructed on the waterfront since inscription of the world heritage site in 2004 is the Lexington Tower on Princes Dock. It was handled as a standalone planning application, outside the scope of the outline permission for Liverpool Waters, and sits on the site of a pre-existing expired permission for a tower of similar height. There was no objection from Historic England. The building reads as part of the 1960s city centre plan office expansion zone. Sitting on lower ground, its top storey is significantly lower than the nearby, pre-existing, Beetham Tower.

### *Has there been a history of big structures on Liverpool's waterfront?*

Yes. The Liver Building was built on an infilled former dock. It is an example of early-20th-century 'skyscraper-style' office building construction, and one of the greatest and most famous features of the world heritage site. It was the first building in England to be described as a skyscraper. The office expansion zone is immediately adjacent to the Pier Head, and full of tall buildings from the late 1960s, 1970s and later.

There are many other examples of huge and tall structures on the Mersey waterfront. These include the former Bibby building; the former Clarence Dock Power Station; the colossal former 'Dockers Cathedral' grain silo; the Seaforth Dock container cranes and grain silos; the Albert Dock (not tall but massive in scale); the Stanley Dock Tobacco Warehouse; and the former New Brighton Tower (once one of the tallest structures in Britain) – not to mention ocean liners, oil tankers and cruise liners. Nonetheless, the

third Unesco mission to Liverpool concluded that 'Key attributes of the waterfront and the quays are essentially the large-scale horizontal warehouse buildings'<sup>6</sup>.

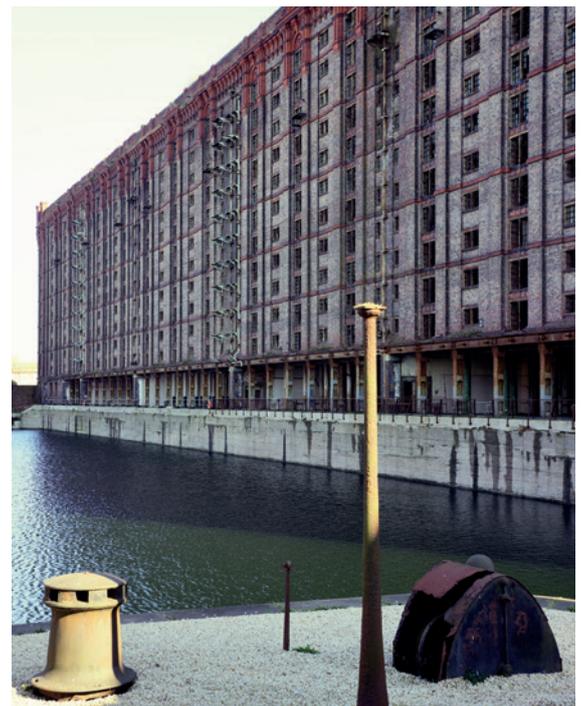
### *Will the Everton football stadium damage any built-heritage assets?*

No. The stadium is a high-quality development and all the historic fabric, including all the dock walls, the former hydraulic engine house and, where they exist, original surfaces and materials, will be restored and preserved. The development will enable people to get to the waterfront and the river. However, in order to build the stadium it will be necessary to fill in part of the disused water areas in the dock.

The planning permission for the stadium was granted in February 2021 by the city council. As with the Liverpool Waters permission, the secretary of state for housing, communities and local government decided not to call in the application for his consideration, effectively giving the green light to the proposal. In a letter to *The Times*, the stadium was supported by the mayors, chief executives from both football clubs, the vice chancellors, business leaders and both bishops. In an opinion poll, 98 per cent of those surveyed supported the plan.

### *Leaving aside the derelict North Docks, what has happened in the bulk of the world heritage site?*

There has been huge progress, including the complete reconstruction of the city centre public realm, new modern buildings at Mann Island (to which Unesco did not object), the award winning Liverpool One scheme (saving and opening the remains of the world's first enclosed wet dock for



Liverpool has long traditions of colossal waterfront structures, such as Tobacco Warehouse (built on an infilled dock), seen here (Photo: Peter de Figueiredo)



Liverpool One: the award-winning development in the heart of the former world heritage site carefully preserves vistas, reinstates historic street patterns and scrupulously conserves the underground remains for the world's first commercial enclosed wet dock (Photo: Peter de Figueiredo)

public access), the restoration of Stanley Dock, the restoration of the huge Tobacco Warehouse (in progress), and many other schemes which have brought back into use prominent listed buildings for hotels and housing. The tower in the Liverpool One scheme was reduced in height to meet concerns from English Heritage. The Strand, formerly a six-lane, motorway-style road, caused acute severance between the Pier Head and the city centre parts of the world heritage site. It is currently being narrowed to a tree-lined boulevard. Across the city only 2.5 per cent of listed buildings are now at risk, down from 13 per cent in 2000. The council estimates that since designation as a world heritage site, £700 million has been invested in heritage projects.

*How many other world heritage sites have been taken off the list?*

Two. The Arabian Oryx Reserve in Oman, after the Oryx population dwindled and the Oman government unilaterally reduced the protected area by 90 per cent, and Dresden, because Unesco objected to a new bridge. Many other severely damaged sites remain on the list, including Palmyra in Syria, where many monuments were destroyed by ISIS terrorists in 2014<sup>7</sup>.

*Have tall buildings been built near other UK world heritage sites?*

Yes. The Tower of London World Heritage Site is surrounded by new tall buildings, including some of the tallest new buildings in Europe, such as the Shard, the 'Walkie Talkie' and the Gherkin/Swiss Re building.

*What are the main lessons from Liverpool's loss?*

First, draw realistic boundaries. A city is not a museum. Think very carefully before including derelict and disused areas, where there is known to be an appetite for major investment

and change. Second, be fair and pragmatic in responding to the evolution of cities, including the issue of boundary review, and practice conservation, not preservation. At present Unesco will not consider boundary reviews, even when it is clear that circumstances have greatly changed. Unesco did not set out the balance sheet as a whole in Liverpool; it focused on unimplemented or quite minor 'threats', rather than wide-ranging tangible achievements.

Third, respect and communicate with local communities. There should have been public consultation on the revised statement of Outstanding Universal Value. Unesco's response to Liverpool's situation was to send in teams of experts for two or three days on three occasions, to prepare reports. What was needed was long-term relationship building, with a permanent embedded presence to build mutual understanding, rather than delivering critical and sometimes misleading reports.

Fourth, apply fair and consistent policy. Make sure that policy concerns are reflected consistently across world heritage sites and do not allow different standards to emerge. Fifth, scrutinise development proposals properly. Make sure that major development proposals affecting sites designated for their international significance – and the alternative options – are fully considered. Do not side-step government responsibilities by pretending that they are just a local matter.

More effective scrutiny, involving a planning inspector and public inquiry for Liverpool Waters and the Stadium, could have considered alternative options and could have led to a more realistic and sensitive proposal for Liverpool Waters – and one more likely to be implemented. A more robust and open approach might have engendered more support from Unesco and led to compromises that everyone would have been happy with.

#### Reference

<sup>7</sup> Source: <http://endangeredredsites.leadr.msu.edu/site-of-palmyra/>

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## Liverpool's long and winding road

*Dave Chetwyn writes:* The decision taken by Unesco in July 2021 to remove Liverpool's world heritage site status has been well documented. It followed well-publicised difficulties with the city council's planning, regeneration and highways functions, with government-appointed commissioners being brought in, a new mayor being elected, and a new cabinet being appointed. Reactions have tended to be polarised, with criticism focused on the city council, Unesco or the UK government, or combinations of these.

Those blaming Liverpool City Council for the loss of world heritage status focus on the decision to approve a new Everton Stadium on Bramley Moore Dock, involving filling in of the historic dock. This, added to tall building concerns, provoked the Unesco decision. The quality of some other recent development has also been questioned. It has been claimed that some in the city council considered that world heritage status was a barrier to growth. The choice of a site that involved filling in the historic dock was undoubtedly controversial in terms of heritage, culture and place. The city council would point to significant economic benefits and widespread public support for a new stadium. This included support from Merseyside Civic Society.

The proposal comes from Peel and Everton Football Club. Everton had been looking at sites on or near to the waterfront for some time. This placed the city council in a position of having to balance Unesco's concerns over filling in the dock with its aspirations for regenerating the waterfront, in the context of serious challenges to economic viability. The dilemma for elected

decision makers is clear. What is less clear is the extent to which the council was in a reactive position or was complicit in the choice of site. That said, there is a clearly a strategic case for the siting of the stadium, not least to separate the regeneration area from existing industry.

The dynamic between Unesco, the city council and the UK government has to be considered. Unesco expressed general concern over the UK's planning system in terms of heritage protection. The UK government was asked to call in the Bramley Dock planning application, but declined to do so, despite the issues of national and international importance. There has been some suggestion that Unesco used Liverpool as a tactic to warn the UK government. That is a very serious allegation, but difficult to prove.

Those who criticise Unesco would point to a narrow cultural focus, and a failure to consider economic realities or the wider social, economic and environmental context. Serious questions are raised by a remote body making a decision that affects residents and businesses, without proper consultation. The same applies to a failure to consider the economic context of the waterfront and the economic impacts of removing world heritage status. The timing of Unesco's decision has also surprised some, given the recent changes of leadership within the city council and the uncertain economic impacts of the pandemic.

### Regeneration and economic development

There can be no question that the scale of the transformation of Liverpool's city centre over more than three decades has been dramatic. The city has come a long way since the debates over managed decline in the 1980s. However, there

Site works for Everton Stadium, including the preservation of historic structures, are under way. In the background are the tall Seaforth waterfront cranes and turbines (Photo: Peter de Figueiredo)





Albert Dock and Liverpool One: the new tower block on the right was controversially truncated to meet the requirements of English Heritage (Photo: Peter de Figueiredo)

has been some criticism that regeneration efforts have focused on the city centre, while the north and other parts of Liverpool have been neglected.

### Britain's greatest place

It is impossible to understand Liverpool City Centre's regeneration without appreciating the transformative power of its heritage. The regeneration of the Albert Dock was a catalyst to the later transformations, helping the city to challenge negative perceptions, and create business and investor confidence. In terms of creating such confidence, the world heritage status was a gift. Peripheral historic areas have also provided flexible and affordable floorspace for business and enterprise. Heritage continues to be a catalyst, for example in the regeneration of Stanley Dock. In 2015, the RTPI named the Liverpool Waterfront as Britain's greatest place, based both on the historic environment and on recent buildings and spaces.

Liverpool has made substantial progress on reducing the proportion of buildings at risk from 13 per cent in 2000 to 2.5 per cent today. This impressive achievement demonstrates a virtuous relationship between heritage conservation and economic growth.

Liverpool does not have to choose between growth and heritage. Heritage helps to achieve sustainable economic and physical regeneration. Nonetheless, some have argued that loss of world heritage status is beneficial, although there appears to be little evidence for that. The developers who have welcomed the loss of world heritage status are not necessarily the ones who will deliver the *quality* of development and regeneration required to take Liverpool to the next level. Higher quality thresholds

for development are a factor in the more successful cities, while acceptance of substandard development can lock an area into a cycle of low expectation and underachievement.

Media coverage has tended to be polarised when it comes to the quality of development in Liverpool, with some suggesting that it is all good or all bad. In reality the quality of development, including tall buildings, has been variable, ranging from international exemplar to mediocre.

Intervention by heritage bodies has not always been beneficial. For example, the reduction in height by a few storeys of One Park West led to an unbalanced and less satisfactory composition. Nor has there always been an understanding of the nature of the heritage itself, especially 20th-century heritage. The Liver Building was an example of high-rise, Chicago-style development, imported on to the Liverpool waterfront. It is now celebrated as one of the 'Three Graces'.

Unesco's negative reaction to an early CGI (computer-generated image) showing high buildings across the waterfront appears to have led to later CGIs showing lower, but bland, designs. The debate should be about actual development, not CGI.

### Implications

Unesco's decision raises a fundamental question over the purpose of world heritage sites. World heritage designation recognises the universal value of heritage in a global context. However, the decision to remove world heritage status on the basis of how heritage is managed appears to shift Unesco's focus to a management-monitoring function, rather like blue flag status for beaches. This blurring of the purpose of designation has



Long disused, this former watch factory in Ropewalks, within the former world heritage site, has been restored and houses the Wreckfish restaurant on three floors. (Photo: Peter de Figueiredo)

led to inconsistency of approach. It is clear that the Liverpool site still merits world heritage designation on the basis of its universal value, despite Unesco's concerns over its management.

A narrow cultural ethos is not sensible in complex urban centres, and can actually undermine conservation of the historic environment. It is necessary to consider the wider social, economic and environmental context of heritage. Heritage bodies that fail to consider the wider context and impacts of their decisions, or to engage with those affected, are not acting sustainably.

There are also questions of how realistic world heritage sites are in complex urban areas with viability challenges. If the focus of world heritage designation is now on management, understanding of economic context is fundamental, yet it appears not to have been a factor in Unesco's decision. The greatest threat to Liverpool's heritage arises from challenges relating to viability. In cities like Liverpool, an uncompromising approach to heritage is not likely to result in effective conservation, just as an indiscriminate acceptance of development of any quality will not lead to the best economic outcomes.

World Heritage UK, which describes itself as 'the only organisation exclusively focused on world heritage in the UK, and the only one that is led by the sites themselves, reflecting a community-driven approach that has proven effective at many sites and which is favoured by Unesco', regretted the loss of world heritage status. 'This action will be damaging to the credibility of the world heritage sector in the UK and elsewhere,' it wrote.

World Heritage UK had suggested amending the boundary of the world heritage site as a potential way forward, but to no avail. There are

many who have the view that the boundary was drawn too widely. It is unclear why amendment of the boundary was not considered by Unesco.

In terms of protecting Liverpool's heritage, world heritage status is a material consideration in planning decisions, so this has been lost. However, much of the protection has always been from national and local designations, including listing, conservation area designation and scheduling. These designations remain. The more serious implication of loss of world heritage status is perhaps the loss of marketing potential, possible access to funding, and harm to business and investor confidence.

## Conclusions

The false dichotomy between heritage and growth needs to be challenged. For the city's new leadership, heritage can provide part of the solution to making the city more competitive and attractive to investment. For the UK government, the reluctance to intervene needs to be questioned. It is down to government to ensure that heritage protection for world heritage sites is sufficient. That is not to say that current provisions are necessarily insufficient.

There are fundamental questions over Unesco's decision, and over the organisation's legitimacy and democratic deficit. The purpose of world heritage designation has become blurred. It is unclear whether designation is based on heritage value or management, or whether heritage management is considered in narrow cultural or real-world terms.

Was Unesco right to be concerned over tall buildings? Yes, but over the quality and location of tall buildings, rather than opposing them in principle. Were there problems with Liverpool's planning and regeneration functions? We now know that there were, and that these resulted in complete change in political leadership. Was Liverpool City Council right to approve the Everton scheme? There will never be consensus over this, but the decision was taken by elected representatives, following consultation, and taking account of a range of social, economic and environmental factors.

Was Unesco right to be concerned over the infilling of the historic dock? Of course; anyone with an interest in heritage would share that concern, even some of the people who supported the scheme on balance. Was Unesco's response appropriate, constructive and proportionate? Clearly not. It raises fundamental questions over Unesco's legitimacy, and whether it is fit for purpose in a world facing complex and fast-changing challenges. Does Unesco have the in-house skills to consider management of world heritage sites? The Liverpool decision does little to provide reassurance.

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