**Consultation on the Draft Heritage Framework and Strategy for**

**South Georgia & the South Sandwich Islands**

**Response to the Consultation**

1. The consultation on the draft Heritage Framework and Strategy for South Georgia & the South Sandwich Islands ran from 10 July to 18 August 2017. In addition, the Heritage Framework and Strategy were reviewed and commented upon by the Heritage Advisory Panel both in April 2017 and again during the consultation period.
2. The Heritage Framework and Strategy has been prepared by heritage consultants *Purcell*. It was commissioned by the Government of South Georgia & the South Sandwich Islands (GSGSSI) following the publication of its 5-year *Strategy 2016-2020*. The Heritage Framework and Strategy sets out a conservation philosophy and a set of conservation principles that will form the basis of future policy and decision-making on cultural heritage matters. It also sets out a draft strategy to enable the Government to meet its heritage objectives.
3. Included within the document are proposals for a cultural heritage management plan for Grytviken which will provide a planned and comprehensive approach to managing this important heritage site. It also proposes a system for categorising heritage assets that will assist in their relative prioritisation and appropriate management.
4. The public consultation resulted in five responses. This document summarises the key issues raised by respondents and sets out the Government’s response.

**General Comments**

1. Respondents generally welcomed the Heritage Framework and Strategy as a sound basis for the future management of the heritage assets of South Georgia & the South Sandwich Islands (SGSSI).
2. The principle of using assessments of significance as the basis for decision-making was seen as positive although it was requested that the process of assessing significance for each asset should be clear and recorded so that others could understand how the level of significance assigned had been reached. Purcell has since developed a set of criteria and the scores of assets against these criteria will be recorded as part of the Categorisation process.
3. One consultee commented that natural and intangible heritage were not considered as part of the Heritage Strategy. The remit of the Heritage Strategy is primarily the built heritage assets with a view to its conservation and management. The contribution of intangible heritage is noted in section 2.1.
4. Concerns were expressed that the proposed Register of Categorised Heritage Assets and Heritage Asset Management System, together with the existing database, would create multiple places in which data about heritage assets would be held. It was the intention that the Register and the Heritage Asset Management System would contain information relating only to known, extant, categorised heritage assets, unlike the existing database. However, it is acknowledged that the information could be held in a single database and extracted in different ways. Sections 4.1.4 and 4.2.4 regarding the format and distribution of the Register and the Heritage Asset Management System has been amended to allow for this integrated approach.
5. It was commented that the schedule on which the Register of Categorised Heritage Assets is to be based should first be updated. The GSGSSI has already commissioned this. It was also commented that additional field research should be undertaken. A section on developing the Heritage Asset Management System (4.2.2) has been added to reflect this.
6. A comment was made that any future decision-making regarding South Georgia’s heritage assets should be transparent. The Heritage Strategy was not altered in this regard as the systems for decision-making will be set out in the future heritage legislation.
7. Two consultees commented on the urgency of recording and conservation works to SGSSI’s heritage assets. The GSGSSI is aware of this and has commissioned the Heritage Framework and Strategy together with the Categorisation of the Heritage Assets to help identify the areas of greatest need. The GSGSSI welcomes discussion on potential projects for recording and conservation works.
8. One consultee emphasised the need for greater outreach and education with greater formal ties to institutions in Europe and the Falkland Islands. The GSGSSI continues to explore opportunities for such links.

**Specific Comments**

1. One consultee stated that the Heritage Advisory Panel (HAP) should be formalised and given executive powers. Two other consultees made suggestions as to additional panel members. The Heritage Strategy has not been altered but the GSGSSI will review the HAP in due course.
2. There was support for the preparation of Conservation Management Plans (CMP) but two respondents queried the proposed composition of the suite of CMPs. The CMP for Grytviken is already a stated objective in the GSGSSI’s Strategy 2016-2020. The Heritage Strategy was amended to be less prescriptive regarding the subject of any other CMPs that may be commissioned.
3. Two consultees expressed concern regarding the phrasing of section 3.2.7, specifically “There is potential that sources or offers of funding for conservation works may periodically become available from non-governmental sources. These will be directed in accordance with the overarching strategy of preserving all aspects of SGSSI’s heritage and the priorities for conservation that have been identified.” This has been amended to reflect better the intended meaning that the Heritage Strategy should provide the shared focal point for directing funding towards SGSSI’s heritage assets.
4. Three consultees suggested that fur seals could and should be excluded from some heritage sites, contrary to section 4.5.1. It remains the view of GSGSSI that there are ecological concerns regarding the potential to cause harm to seals and the aesthetic impact on heritage assets of seal exclusion measures which means it is not appropriate to advocate seal exclusion measures in the Heritage Strategy.
5. Two respondents questioned the proposed retention of the exclusion zones around the whaling stations other than Grytviken. Given the continued presence of the asbestos, the unstable nature of most of the structures and the loose material, the exclusion zones will remain in place until the risks have been mitigated.
6. There were various specific comments on the proposed Heritage Asset Management System. These included:
   1. The system should include records of applications for inclusion and for items that have been removed. The Heritage Asset Management System is intended to be a management tool for known heritage assets that have been categorised; features that are not deemed heritage assets or heritage assets that are lost will be recorded on the central database but will not form part of the Heritage Asset Management System.
   2. Day to day management of the System could be carried out by an expert subcontractor. Section 4.1.4 already allowed for this possibility.
   3. The Type of Monument category may be problematic as it does not allow for non-built heritage assets nor does it allow for multiple-type assets. The purpose of the Heritage Asset Management System is to manage the known built heritage assets and therefore has been designed to do this. The Type of Monument category has been created to understand the asset’s vulnerability and its potential for decline, conservation or relocation (for example, a vehicle theoretically is easier to move for conservation than a sealing hut.)
   4. A fourth category of accessibility level is needed to accommodate sites that visitors are not permitted to access but to which access is relatively easy. The Heritage Strategy has been amended to reflect this.
   5. An additional category for condition is required to allow for assets that require not works but do require occasional monitoring. The Heritage Strategy has been amended to reflect this.
   6. Co-ordinates should be included for each heritage asset. This has been included.
7. One consultee questioned the emphasis on security of assets in section 4.3.2.2. The GSGSSI will continue to review the situation but in principle proposes to make information about the heritage assets publicly available.
8. Two consultees commented that the existing Visitor Booklet is large enough as it is and the addition of more heritage information would not be beneficial. The proposal to provide more information regarding the heritage assets in the booklet has therefore been removed from the Heritage Strategy.
9. One respondent made comments regarding the relationship between the GSGSSI and the South Georgia Museum. There is already an agreement regarding this in place. Another respondent commented that it would be useful for the proposed database to be linked to the Museum’s database. Section 4.1.2 has been amended to reflect this possibility.
10. It was noted that the Policy on the Release and Movement of Artefacts has now been adopted so the Heritage Strategy has been amended to reflect this.

**Minor Amendments**

1. A number of small additions, amendments and clarifications have also been made to the Heritage Strategy following the consultation comments. These include the addition of references to translocation alongside salvage, the archival materials held in the USA, Carl Larsen in the brief history, removal of objects for study and works of recording alongside works of conservation. The tourism numbers have been amended to reflect that only 9,000 of the 14,000 visitors to South Georgia last year were tourists; the cut-off date for consideration of objects for categorisation has been amended from 1983 to 25 years before the time of categorisation; the locations of the sealing sites have been amended and the fact that all native species are protected has been clarified.

**Next Steps**

1. The Heritage Framework and Strategy has been amended following the receipt of comments during the public consultation and from the HAP. The Heritage Framework will be adopted by the GSGSSI, which has already commissioned a desk-based Categorisation of the Heritage Assets.