

[REDACTED]
Ambassador
Permanent Delegate of Germany to
UNESCO

[REDACTED]
Ambassador
Permanent Delegate of the
Swiss Confederation to
UNESCO

Maison de l'UNESCO

6 June 2023

**Culture Sector
World Heritage Centre**

Ref: CLT/WHC/EUR/22/14027

Dear Ambassadors,

I am pleased to transmit herewith the ICOMOS Technical Review of the wind energy development proposals at [REDACTED], situated within the wider setting of the World Heritage property '**Monastic Island of Reichenau**' in Germany, based on the detailed documentation submitted by the Permanent Delegation of Germany to UNESCO on 30 September 2022. I would also like to express my appreciation for the excellent cooperation between your States Parties and [REDACTED] to accommodate the conclusions of the ICOMOS Technical Review in the approval process of these projects. Please note that ICOMOS considers that the construction of wind turbines would impact the attributes of the Outstanding Universal Value (OUV) of the property by introducing new moving elements into the landscape that may alter the location and setting, as well as the spirit and feeling, which are essential to maintaining the property's authenticity.

[REDACTED] It notes that impact assessment must be based on an understanding of the full life cycle of a project, that approvals should be based not only on location but also on prescribed maximum heights above which impact assessments should be undertaken to gauge potential impacts on the OUV and [REDACTED]

[REDACTED] ICOMOS concludes that the mitigation process should be applied to consider the reduction of cumulative negative impacts, and that its results should be submitted to the World Heritage Centre for review by the Advisory Bodies before further approvals for these projects are granted, or contractual commitments made.



I would be grateful if you could transmit the ICOMOS Technical Review to the competent authorities for their consideration and keep the World Heritage Centre informed of the action taken on its recommendations. I trust that the new [Guide for Wind Energy Projects](#)

in the World Heritage Context and the participation of experts from your respective countries in the launch workshop on 22 and 23 March at UNESCO Headquarters will provide valuable guidance in the implementation of these recommendations.

The World Heritage Centre and ICOMOS remain at your disposal for any clarification or assistance you may require.

I thank you for your continuous collaboration and support in the implementation of the World Heritage Convention and remain,

Yours sincerely,


Director 

Enc.: ICOMOS Technical Review of the 'Wind energy Development Proposals at


cc: Permanent Delegation of Germany to UNESCO


German Commission for UNESCO


National Focal Points for the implementation of the World Heritage Convention
ICOMOS International

ICOMOS Technical Review

| | |
|---------------------|--|
| Property | Monastic Island of Reichenau |
| State Party | Germany |
| Property ID | 974 |
| Date of Inscription | 2000 |
| Criteria | (iii)(iv)(vi) |
| Project | Wind Energy Development Proposals [REDACTED] [REDACTED] |

1. Background

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED];
- [REDACTED]
- [REDACTED]).

The States Parties' submission includes five annexed documents. These annexes are:

- [Annex I HIA WHS Reichenau Attribute Mapping-ENG Digital.pdf](#): a copy of the attribute inventory project undertaken by the Institute for Heritage Management, published in March 2022;
- [Annex II HIA WHS Reichenau Visibility analysis.pdf](#): Visibility analysis of the area around the World Heritage property up to a distance of 10 km and including for construction up to a height of 240m;
- [Annex III HIA WHS Reichenau Visual Axis.pdf](#): a series of computer-generated images indicating the proposed wind energy developments as seen from three viewpoints outside the property, and including data on the number and size of the turbines proposed;
- [Annex IV HIA WHS Reichenau Matrix impacts.pdf](#): a one-sheet document containing a table that summarises the intensity of the potential impact of the wind energy developments on the key attributes defined in the above-mentioned attributes mapping;
- [Ref11309 Annexes.pdf](#): Copies of the third-party reports on the wind energy proposals dating to 2018.

In their submission letter, the States Parties note that:

"Due to their location and distance from the World Heritage Site, [REDACTED]
[REDACTED]
[REDACTED] do not pose a threat to the visual integrity of the Reichenau Monastery

on the matter of setting:

“Effective management involves a cycle of short, medium and long-term actions to protect, conserve and present the nominated property. An integrated approach to planning and management is essential to guide the evolution of properties over time and to ensure maintenance of all aspects of their Outstanding Universal Value. This approach goes beyond the property to include any buffer zone(s), as well as the broader setting. The broader setting, may relate to the property’s topography, natural and built environment, and other elements such as infrastructure, land use patterns, spatial organization, and visual relationships.”

The information provided by the States Parties indicates that the wind parks alter the setting of the property. Paragraph 82 of the *Operational Guidelines* provides a framework for the assessment of the conditions of authenticity. This includes, but is not limited to:

- *form and design;*
- *materials and substance;*
- *use and function;*
- *location and setting;*
- *spirit and feeling;*

It is not clear if the summary impact assessment contained in the (Annex IV) impact assessment table is the result of these consultations. This table provides a graphic overview of the expected impacts due to all four proposals on the attributes defined in the 2022 Reichenau_Attribute Mapping. [This review does not address the appropriateness of the attributes identified through this mapping. It classifies these in three categories: ‘Significance’; ‘High Significance’ and ‘Highest Significance’.⁴ It is notable that this mapping identifies attributes of the Outstanding Universal Value located outside the property. Some of these attributes are indicated to have ‘High Significance’ to the property’s Outstanding Universal Value. This might indicate that the boundaries of the property are not delineated in such a way as to include and protect all attributes of the Outstanding Universal Value, as required by Paragraph 99 of the *Operational Guidelines*⁵].

The Annex IV impact assessment matrix reviews the impact of the proposed wind park developments only on the 15 attributes identified as having the ‘Highest Significance’, but not the others identified. This matrix shows that based on the assessment (of which the method is not communicated),

⁴ Institute for Heritage Management 2022. *Monastic Island of Reichenau – Attribute mapping of the World Heritage property*. p. 109.

⁵ “The delineation of boundaries is an essential requirement in the establishment of effective protection of nominated properties. Boundaries should be drawn to incorporate all the attributes that convey the Outstanding Universal Value and to ensure the integrity and/or authenticity of the property.” Refer also to Paragraph 88: “Integrity is a measure of the wholeness and intactness of the natural and/or cultural heritage and its attributes. Examining the conditions of integrity, therefore requires assessing the extent to which the property: a) includes all elements necessary to express its Outstanding Universal Value...”

property.

[REDACTED]

The construction of wind turbines within the setting of the property would therefore impact the attributes of the Outstanding Universal Value of the property. It will also introduce new moving elements in the landscape, which may alter the *location and setting* and *spirit and feeling*, which are essential to the maintenance of the authenticity of the property.

When assessing such proposals, an evidence-based approach is necessary. [REDACTED]

[REDACTED]

[REDACTED]

It is important to note that Impact Assessment is a requirement under the *World Heritage Convention*, that impact assessment should be based on an understanding of the full lifecycle of a project, including construction, operation and decommissioning. In the case of wind energy projects, future repowering could lead to the construction of higher turbines. Therefore, it is important to ensure the approvals are based not only on location, but also prescribe maximum heights beyond which impact assessments would need to be undertaken to gauge potential impacts on the Outstanding Universal Value of a property.

In the spirit of Article 4 of the World Heritage Convention, the *Guidance and Toolkit for Impact Assessment in a World Heritage context* (2022), developed in collaboration between the Advisory Bodies and the World Heritage Centre, notes that: “Negative impacts on Outstanding Universal Value should always be avoided altogether, since the OUV of a World Heritage property is irreplaceable and damage to OUV is unacceptable.” Mitigation processes are therefore an essential part of the impact assessment process. [REDACTED]

[REDACTED]

[REDACTED]

4. Conclusions and recommendations

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

ICOMOS considers that:

- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED] The process of mitigation should be applied to investigate reducing these impacts further as cumulative impacts and a report on this be submitted to the World Heritage Centre for review before any further approvals for these projects are granted or contractual commitments made.
- [REDACTED]
[REDACTED]
[REDACTED], or it be shown that no further mitigation is found to be possible or feasible, approvals for these projects should be based on the maximum height and number of turbines on which the impact assessment was undertaken. Any changes to these approvals in terms of number or scale of turbines, should be subject to new impacts assessments.

[REDACTED]

[REDACTED] and the recently published digital resource: *Wind Energy: Guidance for Wind Energy Projects in a World Heritage Context*.⁷

The State Party of Germany may also wish to consider if the boundaries of the property have been delineated in such a way as to: “incorporate all the attributes that convey the Outstanding Universal Value and to ensure the integrity and/or authenticity of the property”.⁸

ICOMOS remains at the disposal of the State Party for further clarification on the above or assistance as required.

ICOMOS, Charenton-le-Pont
May 2023

⁶ <https://whc.unesco.org/en/guidance-toolkit-impact-assessments/>

⁷ <https://whc.unesco.org/en/wind-energy/>

⁸ Paragraph 99 of the *Operational Guidelines*.