



**Lovö Hembygdsförening**

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### **Acute threat against word heritage Drottningholm**

A number of times ICOMOS Sweden has written to the Swedish Transport Administration about a road project which threatens the word heritage of Drottningholm. The situation has become worse because four authorities have made an agreement on the 11 of April 2011 in which they agree about how the connection of the Ekerö road to the tunnel under the Lovö Island will be designed. The main substance of the agreement is that two roundabouts will be built on the south of Lovö and that the Ekerö road will be broadened from three to four lanes through the word heritage of Drottningholm. Amazingly one of the signatory authorities is the Swedish National Heritage Board whose purpose it is to protect the Swedish world heritages from effects of the kind the authority approves in the agreement. The other three authorities are the Swedish Transport Administration, the local authority of Ekerö and the National Property Board which owns the greater part of Lovö – the part which will be influenced by the road project.

By the provisions about matter-of-factness and non-partisan in the Constitution made concrete in the rules of procedure and practice The Swedish National Heritage Board is not allowed to promise anything before the objective examination shows that the proposition is possible by law, meaning not before a formal inquiry by *Regulation (1988:1229) about state-owned building remembrances etc.* At this examination a satisfactory foundation for a decision which shows the measures and at least one alternative proposition must be presented. The executives of the National Heritage Board have managed the problem without regard to the expert knowledge in the organisation and they have therefore abandoned the normal procedure. The national antiquarian, Inger Liliequist, gave an early promise to the Swedish Transport Administration that the National Heritage Board would approve a suggestion with two roundabouts on the south of Lovö and broadening of the Ekerö road from three to four lanes through the word heritage of Drottningholm without sufficient foundation for a decision. This procedure is a violation of procedure and practice by which binding promises must not be given at early consultations. When the National Heritage Board expresses an opinion on a problem when a world heritage can be affected the office also shall follow the instructions from the government, *2001/02:171 Unescos world heritage convention and the Swedish world heritage objects*, which neither Inger Liliequist nor the head antiquarian, Knut Weibull, did. The management of the National Heritage Board did not allow the experts of the office to prepare the commission. They gave an oral promise to the Swedish Transport Administration project leadership that the Swedish National Heritage Board will accept the proposal with two roundabouts on the south of Lovö and the broadening of the Ekerö road from three to four

lanes through the word heritage of Drottningholm. This shocked and upset the experts of National Heritage Board and some of them told Lovö Hembygdsförening what had happened.

**Before the 11 of April 2011 National Property Board and Swedish National Heritage Board had this opinion:**

The National Property Board wrote on the 16 of February 2009 about the Swedish Transport Administrations material before the governments decision by chapter 17 environment act about "More effective North-south communications in the Stockholm area" – completions by request of the environment department 2008-11-14: "Summary: The National Property Board has in earlier considerations rejected suggestions from the Swedish Transport Administration referring to measures, which represent encroachments on the cultural-environment and increase the traffic-stress on the Lovö island, harm a long-term national interest which carries a greater weigh than the road-project." "The National Property Board opinion is that a long-range lasting solution of the traffic-situation on Mäläröarna ought to emanate from public transport rather than private motoring, in readiness not only for busses but eventually also for new, railbound transport-systems." "From the alternatives the Swedish Transport Administrations presents in its material the alternative 5 with roundabout on Lindö, by the National Property Board opinion, the only alternative which possibly can be carried out without obviously harming the cultural environment on Lovö." The National Property Board does not have the same opinion as the Swedish Transport Administration that alternative 1 is economically most profitable. It is directly inconceivable that the Swedish Transport Administration, after its own account of the consequences for the environment, concludes that the roundabouts on Lovö do not risk damage on the national interest!"

The Swedish National Heritage Board wrote about the same material: "Summing-up our opinion: The opinion of the Swedish National Heritage Board is as stressed earlier, that the suggestions before the government approval by the Swedish Transport Administration with two roundabouts on Lovö will obviously harm the world heritage and the area of national interest Drottningholm." "In the supplementary material the Swedish Transport Administration shows that it is possible to build roundabouts outside Lovö. With these words there is an alternative which means that harming the area of national interest can be avoided." "In the supplementary material the Swedish Transport Administration shows that it is possible to build on- and of-roads with roundabouts outside Lovö. With this said there are alternatives which means that obviously harming the area of national interest can be avoided. The landscape of Lovö is a world heritage with unique qualities, a culture environment of national interest and a valuable part of the green areas of Stockholm. Lovö island represents great values in a global, national, regional and local perspective. Everyone has the responsibility to administer these values." "In the UNESCO world heritage convention article 4 stresses the duty to secure, protect and preserve for future generations the cultural- and nature values behind the identification of a word heritage.

The local authority of Ekerö has during the process had an opposite opinion. This authority values the world heritage and the environment on Lovö differently. In a letter 2010-09-01 to the director-general of the Swedish Transport Administrations you can read: "The unique natural environment and the colombarium at Malmvik mansion, are included in the national area of interest for preservation of cultural values on Lindö-Lovö-Kärsö, which also is a bufferzone for the world heritage of Drottningholm." "To sum-up we are distinctly against a roundabout on Lindö. The undersigned parties strongly recommends alternative 1 according to the consultation material of the Swedish Transport Administration in September 2009 – and supported by the agreement about the transport infrastructure between the Swedish Transport Administration and the local authority of Ekerö, on the 20 of February 2008 respective on the 30 Mars 2010." The undersigned parties are the chairman of Ekerö

community board, Peter Carpelan, and the chairman of the foundation Marcus and Amalia Wallenberg Memory, the owner of Lindö. The local community subordinates universal values, national values a very special local interest, the interest of the owner of Lindö. The big majority of the Ekerö inhabitants would on the contrary gain on being able to drive down to the tunnel from a roundabout on Lindö, no second tunnel pipe would be needed, fewer cars would take the road from Bromma through Drottningholm to Stockholm Bypass and the world heritage would be less affected with one roundabout on Lindö than with two on southern Lovö.

### **After the 11 of April 2011 is another world**

Before the 11 april 2011 both the Swedish National Heritage Board and the National Property Board were unequivocally and strongly against alternative 1 of the Swedish Transport Administration. But on the 11 of April 2011 everything changed. What earlier was unthinkable was transformed to an accepted alternative. The leaderships decided outside the rules of their authorities and without accepted preparation. They run over the experts of their own authorities. This is particularly remarkable regarding the Swedish National Heritage Board with the duty to protect the cultural inheritance of Sweden, i.a. the world heritages. Everything written and said after the 11 of April 2011 from the two authorities is directed by the agreement of the 11 of April 2011, for example the letters to ICOMOS International as answers on the repeated criticism from ICOMOS Sweden. Startingly it is the project leader in the Swedish Transport Administration, Riggert Anderson, who suggested answers for the three other authorities to ICOMOS International, Wilifried Lipp, Austria. The head antiquarian, Knut Weibull, has in addition to language viewpoints also suggested alternative formulations with the aim to make the Transport Administration plans more acceptable concerning the world heritage. The leadership of the National Heritage Board more functions more as consultants for exploitation than protector of the world heritage. The Swedish National Heritage Board has in the view of Lovö Hembygdsförening stepped down from its duty as an authority and an important part of our democracy.

To create legality for the project the leadership of National Heritage Board suggested that the Transport Administration should call in an independent specialist with the commission to study the consequences for the world heritage. The specialist became Katri Lisitzin, the Swedish University of Agricultural Sciences. According to the Swedish Transport Administration the study will be conducted according to ICOMOS Guidance. Hembygdsföreningen asked for a copy of Katri Lisitzins instructions and the communication between the Transport Administration and Katri Lisitzin. We received the information that Katri Lisitzin is an underconsultant to the Consortium Bypass Stockholm. Therefore this communication is not public by law. On the 6 September 2011, however, the Transport Administration sent us a description of Katri Lisitzins commission where you can read that she “Writes the HIAreport (according to ICOMOS Guidance)” and “revises the HIA-report in compliance with the project group.” This means that the HIA has not been made by an independent specialist. This is emphasized by the preliminary report (Nov 2011) which is limited by the agreement from the 11 April 2011. Therefore Katri Lisitzin has excluded possible alternative solutions both ICOMOS Sweden and the National Heritage Board suggested before the 11 April 2011, for example roundabouts situated outside Lovö. Such alternatives shall be proposed according to *ICOMOS Guidance, chapter 6: Can impacts be avoided, reduced, rehabilitated or compensated – mitigation, section 6-3 (May 2010)*? Katri Lisitzins report is only about to mitigate the problems for the world heritage as a result of the agreement from 11 April 2011. This means that Katri Lisitzins HIAreport is founded on the same illegal decision the Swedish National Heritage Board made when it without preparation by the rules of procedure and practice and violating the directions in *Regulation (1988:1229) about state-owned building remembrances etc.* and the instructions from the government,

2001/02:171 Unescos world heritage convention and the Swedish world heritage objects approved the suggestion from the Swedish Transport Administration.

**To sum-up:** The protection of the world heritage Drottningholm has been seriously weakened owing to the leaders of the Swedish National Heritage Board. After the 11 of April 2011 the Swedish National Heritage Board does not apply to its own binding rules and does not fulfil its commission to warn when a world heritage is under threat according to article 4 in the World Heritage Convention.

The Swedish National Heritage Board also contributes to degrade a well seen scientist by coerce her to presuppose the illegal agreement and moreover to correct her findings according to the wishes from the mandatory.

***Lovö Hembygdsförening suggests that UNESCO Word Heritage Centre writes to the Swedish government to demand The Swedish National Heritage Board to step down from the agreement of the 11 April 2011 and repeat the whole investigation according to the rules of procedure and practice and the above mentioned laws and regulations.***

Lovö Hembygdsförening considers the actions of the Swedish National Heritage Board leadership as an abuse of authority and will also  
report the Swedish National Heritage Board leadership to the Parliamentary  
Commissioner for the Judiciary and Civil Administration  
brief Transparency International  
use this material to create public opinion

The board of Lovö Hembygdsförening

Bertil Ottoson  
chairman

Karin Wahlberg Liljström Pertti Hänninen

Sture Frykfors

Stina Odlinder Haubo

Ursula Belding

Kim Mac Lellan

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*Copies:*

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