



BNT Advocacy Policy

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Abbreviations

- Archaeology Research Committee (ARC)
- Bermuda Audubon Society (BAS)
- Bermuda Environmental Sustainability Taskforce (BEST)
- Bermuda National Trust (BNT)
- Department of Planning (DOP)
- Historic Buildings Advisory Committee (HBAC)
- Heritage Committee (HC)
- Historic Monument (HM)
- Planning Applications Review Team (PART)

1. OVERVIEW

1.1 Purpose

The purpose of this policy is to guide the Bermuda National Trust (BNT) in its advocacy efforts to protect and promote Bermuda’s unique natural and cultural heritage. In this context, we define advocacy as activities that aim to raise public awareness or to influence public policy or decisions. Advocacy is a core pillar of BNT’s mission and it is essential to ensuring that Bermuda’s environment and heritage are preserved for future generations.

1.2 Guiding Principles

BNT’s advocacy will be:

- **Mission-aligned:** Rooted in our mission to protect and promote Bermuda’s unique natural and cultural heritage.
- **Evidence-based:** Informed by research, expert consultation and community input.
- **Constructive and Respectful:** Engaging stakeholders with integrity and transparency, our approach will be solutions-oriented and the tone of advocacy will be positive wherever possible. We will always engage with respect, fostering a collaborative environment even when there is disagreement.
- **Inclusive:** Reflecting the diverse voices and values of Bermuda’s community.

- **Balanced:** Considering environmental, cultural, social, and economic factors in all positions.
- **Independent:** Free from political partisanship or the undue influence of donors or supporters.

1.3 Advocacy Objectives

BNT advocates to:

- Influence public policy and planning decisions that affect Bermuda's heritage and environment.
- Protect historic buildings and sites, open spaces and natural ecosystems under threat.
- Raise awareness and educate the public on issues related to BNT's mission.
- Encourage community stewardship and participation in heritage conservation and preservation.
- Promote sustainable development, land-use planning and conservation practices.
- Encourage the integration of natural and cultural heritage considerations in all aspects of planning and development.
- Encourage and promote best practices with respect to natural and cultural heritage conservation and ethics, with reference to respected and widely recognised codes of practice where applicable.

1.4 Advocacy Activities

BNT engages in the following activities:

- Submitting formal objections or representations to planning applications.
- Participating on statutory or regulatory bodies such as the St George's Preservation Authority and the National Parks Commission.
- Participating in public consultations and government hearings.
- Publishing position statements, reports, and educational materials.
- Collaborating with other NGOs, community groups, and government bodies.
- Developing awareness-building materials including videos.
- Hosting public forums, campaigns, and events to raise awareness.

1.5 Decision-Making Process

Advocacy positions will be developed through:

- Internal review by the Head of Natural Heritage, Head of Cultural Heritage and/or the Executive Director.
- Analysis of Heritage Impact Assessments (HIAs), Environmental Impact Assessments (EIAs) or other such materials as available.
- Alignment with the Development and Planning Act 1974, Bermuda Plan 2018, Town of St George Act 1950, Bermuda National Parks Act 1986, and other relevant legislation.
- Consultation with relevant committees and experts, and any in the community with a particular link to the issue or heritage resource under consideration.
- Approval by the Executive Director, Executive Committee or Council, depending on the issue's significance, level of public interest and degree of controversy. Issues requiring Executive or Council approval include those that are high profile or controversial and could result in irreversible harm to a Listed Building, the UNESCO World Heritage Site, a significant protected natural ecosystem, or a site of national importance.

1.6 Public Communications

All public advocacy communications must:

- Be approved by the Executive Director, the Executive Committee or Council, depending on the issue's significance.
- Clearly state BNT's values, position and rationale.
- Be respectful, factual, and free from political partisanship.

1.7 Monitoring and Evaluation

BNT will:

- Track the outcomes of its advocacy efforts.
- Review this policy every three years or as needed.
- Adjust strategies based on effectiveness and stakeholder feedback.

1.8 Contact and Feedback

Members of the public are encouraged to:

- Share concerns or suggestions with the Head of Natural or Cultural Heritage.
- Participate in public consultations and BNT-led initiatives.
- Visit www.bnt.bm for updates and resources.

2. SCOPE

BNT's advocacy will be limited to Bermuda and Bermuda-related concerns, although that includes global issues such as the Climate Crisis which impact Bermuda.

2.1 Cultural Heritage

BNT will advocate for the preservation and appreciation of the following:

2.1.1 Archaeology

- BNT will advocate for the protection of potential archaeology within Historic Protection Areas, the curtilage of Listed Buildings and any other areas where there is a reasonably high likelihood of the presence of archaeological resources. In such areas we will urge the conduct of archaeological assessments before any substantive ground-disturbing activities take place and the creation of an Archaeological Management Plan should the assessment conclude that the area or building has archaeological significance.
- Although BNT tends to focus on terrain/land archaeology, underwater cultural heritage is also of critical concern from archaeological research, heritage management, and cultural tourism standpoints. Land and sea are highly interrelated, particularly in coastal and harbour areas.
- BNT and its Archaeological Research Committee strive to align with archaeological ethics (e.g. [UCL Institute of Archaeology's Ethical Guidelines for Research](#) and [the SAA Principles in Archaeological Ethics](#)).

2.1.2 Built Heritage

- Buildings of historic or architectural significance and historic monuments (generally, but not always, on the Listed Buildings Register). These are defined by Planning as having one of more of the following criteria:

- Architectural interest: this refers to buildings that are of importance because of their architectural design, decoration or craftsmanship, and those that are important examples of particular building types or periods of building.
- Historical interest: this refers to buildings that display important aspects of Bermuda's social, economic, cultural or military history, or that have close historical associations with important people or events.
- Group value: this refers to a collection of buildings that possess an important architectural or historical unity (e.g., Dockyard).
- Age and rarity: these are important considerations, as the older a building is, and the fewer the surviving examples of its kind, the more likely it is to have rarity value.
- Other historic structures not given official protection that have special historical or cultural significance that BNT deems worthy of preservation, such as lime kilns, fishponds, quarries and dry-stone walls.
- Traditional Bermuda vernacular architecture in general, recognising its unique cultural significance and how it has arisen from and is responsive to Bermuda's environment.

2.1.3 Historic Areas

- Defined Historic Preservation Areas under the Bermuda Plan 2018, including the St George's Preservation Area, the broader UNESCO World Heritage Site of the '[Historic Town of St. George and Related Fortifications](#)', and the Royal Naval Dockyard
- Historic Preservation Areas within the City of Hamilton
- Historic cemeteries and other cultural landscapes
- Known or potential archaeological sites
- Other areas or groups of buildings not given official protection that have special historical or cultural significance that BNT deems worthy of preservation.

2.1.4 Cultural Artefacts

- Artefacts with particular historical or cultural significance for Bermuda, including but not limited to: Bermuda-made antique furniture, silver and other items with local provenance; old Bermuda documents, maps and photographs; artwork by Bermudians or depicting Bermudians or Bermuda; archaeological finds from land or underwater sites
- BNT advocates for such items to remain in Bermuda wherever possible and for highly significant artefacts to be in the care of Government or a heritage organisation that will allow public and/or research access to such collections.
- BNT and its Museums & Collections Committee strive to align with Codes of Ethics for Museums and Heritage (e.g. [ICOM Code of Ethics](#), [Museums Association Code of Ethics](#), [AAM Codes of Ethics for Museums](#)).

2.1.5 Intangible Heritage

- Bermuda-specific building skills and craftsmanship using local materials; traditional cultural knowledge and practices e.g., Gombey-dancing, kite-flying, use of medicinal plants; local stories and folklore.

2.2 Natural Heritage

BNT's natural heritage advocacy will generally be focused on Bermuda's terrestrial environment. As the largest private owner of open space on the island, BNT has considerable expertise in terrestrial

conservation management; other NGOs in Bermuda focus specifically on the marine environment and have greater expertise in that area.

However, there are many issues that span both marine and terrestrial environments, including plastic pollution and climate change. BNT will partner with other relevant organisations to advocate on such issues and will offer moral support to marine-focused NGOs in advocacy on issues of national importance related to our marine environment. BNT's partnerships with other organizations on issues that span marine and terrestrial environments will be formalized through documented Memoranda of Understanding (MOUs) or joint statements, where appropriate. 'Moral support' will be provided through public endorsements, sharing of resources or data, and participation in joint public awareness campaigns. This ensures that our collaborative efforts are well-defined, transparent, and aligned with the shared mission of protecting Bermuda's unique environment.

BNT will advocate for the protection and appreciation of the following:

2.2.1 Open Space and Natural Ecosystems

- Woodlands
- Wetlands
- Mangroves
- Coastlines and beaches
- Caves
- National Parks

2.2.2 Native and Endemic Flora and Fauna

- In particular, rare or endangered species

2.2.3 Environmental Issues

BNT seeks to raise awareness of and advocate concerning the following issues:

- Overdevelopment vs. sustainable development
- Biodiversity loss and invasive species
- Climate change/renewable energies
- Pesticides and herbicides
- Plastic pollution/single-use plastics

3. PLANNING APPLICATION REVIEWS

3.1 Criteria for submitting an Objection

Objections to proposed developments should be lodged only when there is a clear, demonstrable risk to natural or cultural heritage. The goal is to ensure that objections are not based on general opposition to development, but rather on the protection of heritage of significant importance. Objections should not be lodged for minor issues or concerns that can be addressed through letters of representation, mitigation measures or modifications to the proposed development.

- **Direct Impact on Heritage:** An objection should be considered if the proposed development is likely to result in direct physical damage or irreversible alteration to a recognised heritage site, including buildings, landscapes, ecosystems, or intangible heritage. If the potential risks are clearly irreversible or serious and there is no reasonable expectation that they can be mitigated or resolved through discussion, a formal objection is the appropriate course of action.
- **Loss of Heritage Integrity:** If the development threatens to undermine the integrity of an adjacent or nearby heritage site by altering its context, views, surroundings/setting (as used by UNESCO), or access, such as through inappropriate scale, massing, design, or land use, a formal objection is warranted.
- **Legal or Policy Non-Compliance:** If the development does not comply with established legal protections, zoning laws or regulations, particularly in relation to designated heritage areas or buffer zones, an objection should be made.
- **Environmental Degradation:** If the project could cause significant and irreversible harm to natural ecosystems, biodiversity, or contribute to long-term environmental degradation, an objection should be made.
- **Lack of Sufficient Information:** When a development proposal lacks sufficient information regarding its potential impact on heritage (e.g., missing drawings/views, heritage reports, environmental studies, or cultural impact assessments), and efforts to obtain such information have been unsuccessful prior to the deadline, an objection should be made stating that more information is required.
- **Community Concerns:** An objection should be lodged if there is significant community concern supported by evidence of harm to the cultural significance or natural value of the site. Significant community concern is defined as a measurable and sustained expression of opposition from a group of local residents, a recognized community organization, or a heritage group with a direct connection to the resource in question. This concern must be supported by evidence, such as signed petitions or formal letters of objection. A single complaint or a general expression of disapproval will not, on its own, be considered grounds for a formal objection unless it is supported by a demonstrable risk to heritage.

3.2 Criteria for submitting a Representation (vs. an Objection)

A letter of concern is a tool for expressing reservations or highlighting potential risks related to a proposed development without formally objecting to it. This letter can be used to signal areas of caution and request further evaluation or modifications to the proposal, while maintaining a more constructive and collaborative approach than a formal objection.

- **Proactive Engagement:** A letter of concern is a way to engage constructively with the development process to influence changes early, ensuring that heritage is respected and incorporated into the development in a way that may not require a full objection.
- **Minor or Potential Impact on Heritage:** If the proposed development may have only a minor or uncertain impact on heritage, a letter of concern is appropriate. This includes situations where there is a need for further analysis, but the potential for significant harm is not yet proven.
- **Mitigation or Clarification Request:** If there are concerns that could be mitigated or clarified through further consultation or adjustments to the development plan, a letter of concern can be used to request that these issues be addressed before proceeding. This

might involve asking for additional Heritage Impact Assessments (HIAs) or modifications to development plans to reduce potential risks.

- **Exploration of Alternative Solutions:** If the development has the potential to affect heritage but that threat can be adapted or mitigated through design changes, management plans, or alternative solutions, a letter of concern may be appropriate to encourage further discussion and exploration of these options.
- **Cultural or Community Considerations:** In cases where a development might not directly impact heritage but may have cultural or community impacts, a letter of concern can serve to highlight these aspects and request further consideration in the planning process.

3.3 General Planning and Development Considerations

- **Heritage Impact Assessment (HIA):** BNT should call for HIAs for any development proposal that could affect identified heritage sites, to ensure that any impact is minimised and appropriately managed.
- **Impact Assessments for the World Heritage Site:** Referring to UNESCO's [Guidance and Toolkit for Impact Assessments in a World Heritage Context](#).
- **Environmental Impact Assessment (EIA):** BNT should call for EIAs for projects that may impact biodiversity or natural ecosystems, to evaluate and mitigate negative effects.
- **Archaeological Assessment:** BNT should call for an archaeological assessment for planning applications or development proposals in historical protection areas or sites where there is a high likelihood of archaeological resources referring to DOP [Guidance Note for Archaeological Assessments](#).
- **Adaptive Reuse:** BNT should generally encourage the adaptive reuse of heritage buildings, integrating them into new developments while respecting their historical value.
- **Monitoring and Enforcement:** BNT will advocate for robust monitoring and enforcement of Planning laws and regulations.

3.4 Requests for pre-consultation

Sometimes BNT is approached with a request for pre-consultation on a proposed development. If the development may potentially have a significant impact on natural or cultural heritage at the level of national importance, BNT should agree to the pre-consultation with the aim of providing guidance on the protection of heritage. No commitments must be made with respect to whether or not BNT will ultimately object or otherwise respond to the application submitted.

3.5 Timely Submission

BNT will regularly track Planning applications to ensure that our Objections and Representations are lodged within the relevant consultation period.

4. APPENDIX A

4.1 Collaborative Committees

4.1.1 Planning Applications Review Team (PART)

- Purpose: Reviews all advertised Planning applications and determine if they merit objection/letters of concern.
- Frequency: meets weekly every Monday @ 11am via Zoom.
- Members:
 - BNT Head of Natural Heritage
 - BNT Head of Cultural Heritage
 - BNT built heritage advisors
 - BEST representative/s
 - BAS representative/s
 - Walsingham Trust representative
 - Agricultural Reserve Heritage Cooperative representative
- Output: meetings are not minuted, but decisions and comments on development applications are entered into a shared PART spreadsheet.

4.2 Official Bodies

4.2.1 St George's Preservation Authority (SGPA)

- Purpose: reviews all planning applications within the St George's Preservation Area.
- Authority: *Town of St George Protection of Buildings of Special Interest Act 1950*
- Frequency: meets monthly every first Thursday @ 1-3pm
- Members:
 - Mayor of St George's, Chair
 - Three other elected Town Councillors
 - Three BNT-appointed representatives
 - DOP Heritage Officer attends ex-officio
- Output: Minutes, which are on the DOP CSS as attachments to particular planning applications.

4.2.2 Historic Buildings Advisory Committee (HBAC)

- Purpose: to advise the Development Applications Board on applications that affect a building or site of special architectural, historic or archaeological interest or its setting.
- Authority: Bermuda Plan 2018
- Frequency: meets monthly every second Thursday (the week after the SGPA).
- Members:
 - 7 appointed members
 - DOP Heritage Officer attends ex-officio
- Output: Minutes, which are on the DOP CSS as attachments to particular planning applications.

4.2.3 National Parks Commission

- Purpose: to advise the Minister on matters affecting the long-term conservation and management of the National Parks System.
- Statutory Authority: Bermuda National Parks Act 1986
- Frequency: meets monthly
- Members:
 - BNT representative
 - BAS representative
 - BZS representative
 - BTA representative
 - Eight other appointed members representing park users
- Output: Minutes produced by Parks administrator

5. APPENDIX B

5.1 Relevant Documents

- Bermuda Plan 2018
- Register of Listed Buildings
- City of Hamilton Plan 2025
- North-East Hamilton Local Plan 2022
- Development and Planning Act 1974
- Bermuda National Parks Act 1986
- The Operational Guidelines for the Implementation of the World Heritage Convention