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BUILDING · CONSERVATION

Making Heritage Work

Conservation Principles, Policies
and Guidance
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Dear Ms Moxon

CONSERVATION PRINCIPLES, POLICIES AND GUIDANCE

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation.

The Institute welcomes Cadw's commitment to issue a document of this type and scale, particularly in its avoidance of the unnecessary complexity of its English Heritage counterpart and the fact that it comes closer to being a document of Government policy.

However, the Institute is disappointed with the draft of this document. It relies too heavily on its English Heritage counterpart which is a document of little use to those in conservation practice. Both documents are of an academic nature and do little to inform those involved in the design, regulation or execution of heritage projects what they need to do to be successful. Both documents are squarely based in the language of the side-tracked Heritage Protection Bill which currently seems to have little prospect of proceeding.

In our view the document overplays the understanding of heritage and pays too little attention to its physical preservation and to its utility value as a sustainable resource for the economies and communities of today. However, we shall not elaborate on these points in general here further than to refer you to our response to the CLG consultation on PPS15 which may be found on the Institute's website.

But we welcome the Conservation Policy and Guidance section in principle. We feel that this could be usefully developed into a document that would inform conservation practice in a period in which good planning policy is in short supply.

We would welcome the opportunity to work with Cadw to produce a more useful document for conservation practice.

Our responses to the questions posed are as follows.

1. Are Cadw's Conservation Principles laid out and explained clearly? Please identify any parts of the text that you find hard to understand or that remain unclear.

No. We find it unsound in approach on a number of fronts.

- It is very unclear why Cadw feels the need to prepare a document that relies on so many definitions of common English words that are not in accordance with their normal usage. An example of this is "place" meaning a component of the historic environment rather than a location. The result is that the document is barely intelligible to an informed audience let alone a lay one. Part of the problem is that, as for proposed policy changes in England, there is no single suite of terms that is ideally suited to landscapes, areas, buildings, remains, monuments, archaeology and scattered artefacts.
- Its scope and terminology do not fit well with those used in the legislative framework within which we have to work. The legislation (and previous guidance) generally does use terminologies suitable for the subject matter that are understood by practitioners and communities alike.
- It does not seem to recognise that conservation is, itself, a positive contributor to sustainability. Not only does paragraph 40 do this far too late in the document, it creates the impression that conservation issues are an impediment to the achievement of other public objectives rather than an opportunity to be built upon.

2 Do you feel that there are any key issues that have not been addressed in Conservation Principles?

Yes. We believe that conservation is about valuing heritage for its utility as well as its historic interest. This should lead to the fundamental Principle that heritage protection is one of the foundation stones of sustainability through its settlements built for a low-energy society and its retention of embodied energy.

3 In Principle 2, we propose a different approach to assessing significance from that described by English Heritage. We suggest that this should be based on an assessment of the 'fabric, form and function' of a significant place and the values that people ascribe to it. Do you agree with this approach?

We have the same concerns about this approach as we do about the English Heritage one, although we commend you for having addressed the issue in part. The explanation of significance makes too much of current opinion (particularly that of "people" whose perspective may not be in the full interests of conservation) as opposed to treating heritage evidence as a resource on which future generations may have different views. Whilst we whole-heartedly embrace the principle of community participation, we feel that the document skims over the relative importance of informed expertise, although we think this problem could be resolved with clearer explanation.

A further problem with the "fabric, form and function" approach is that it sits ill in relation to aspects of heritage that do not have these characteristics.

4 In this draft, we have chosen not to have a section on 'Understanding Heritage Values' and 'Assessing Heritage Significance', which appears in

English Heritage's Conservation Principles. Are the explanatory paragraphs under Principle 2 sufficient to enable you to describe the significance of a place, or do you require additional guidance? Would it be helpful to have additional explanation in this document, or have a worked example available on Cadw's website?

We are not convinced by this approach. We have said that we do not find the English Heritage document very useful for practitioners. We do not feel that a "cut-down" version of the English Heritage document is the right approach. We feel that both the Principles and the Policy and Guidance could benefit from a rewrite free of the English Heritage document altogether.

5 Are Cadw's Conservation Policies and Guidance laid out and explained clearly? Please identify any parts of the text that you find hard to understand or that remain unclear?

The Policy and Guidance compartmentalises interventions in a way that is unhelpful. Most conservation projects involve a range of possible interventions (repair, restoration, recording, renewal, replacement, removal) which are not simple alternatives. The format of the guidance is not conducive to this approach.

6 Can you suggest any alterations or additions to Conservation Policies and Guidance?

We think that this part could be made into useful document through a root-and-branch rewrite from the perspective of conservation practice. We would welcome the opportunity to work with Cadw to achieve this but feel that the document would need to be rather longer than the present draft to be truly effective.

7 Cadw is preparing a set of case studies, with examples from the full range of heritage assets, to illustrate past best practice from which Conservation Principles derives. How do you think that these case studies would be best disseminated? Do you know of further examples, which you feel would make good case studies?

We think that case studies would be best presented as a web-based facility. It seems to us to be important to revisit the examples as new or better ones arise.

8 How best can Conservation Principles be integrated into your areas of responsibility or working practices?

We do not think it will be very useful. In England the English Heritage document is little used at practitioner level. If published in its current form we think it would be little used.

We hope these comments are helpful and hope you would feel able to accept our offer of practical help in your consideration of the document.

Yours sincerely



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