

# CONSERVATION PRINCIPLES POLICIES AND GUIDANCE

FOR THE SUSTAINABLE MANAGEMENT OF THE HISTORIC ENVIRONMENT

**Second Stage  
Consultation**



ENGLISH HERITAGE

# FOREWORD

The sustainable management of the historic environment depends on three things: sound principles; clear policies and guidance based on those principles; and the quality of the decisions that stem from them.

In February 2006, English Heritage consulted on *Principles* that we believe should guide conservation thinking and practice in this country. We are grateful for both the number of comments received and for the depth of thought they represented. They indicated widespread general support for the scope and direction of the *Principles*, while offering many helpful suggestions for improvement. In response, we have reduced the seven headline principles to six, and re-ordered and slightly expanded the supporting statements to include definitions. The *Principles* now provide a self-contained text, without a parallel commentary, and we are confident that they are robust and consistent. They are now supported by policies and guidance on their application to making decisions about change in the historic environment.

Throughout the drafting process, our most important source of inspiration has continued to be the knowledge and experience within English Heritage, distilled through debate with colleagues in the historic environment sector and beyond. We would welcome comments on the whole document; but we are particularly interested in views on the proposed *Policies and Guidance*, and whether the document as a whole is understandable and useful to the sector.

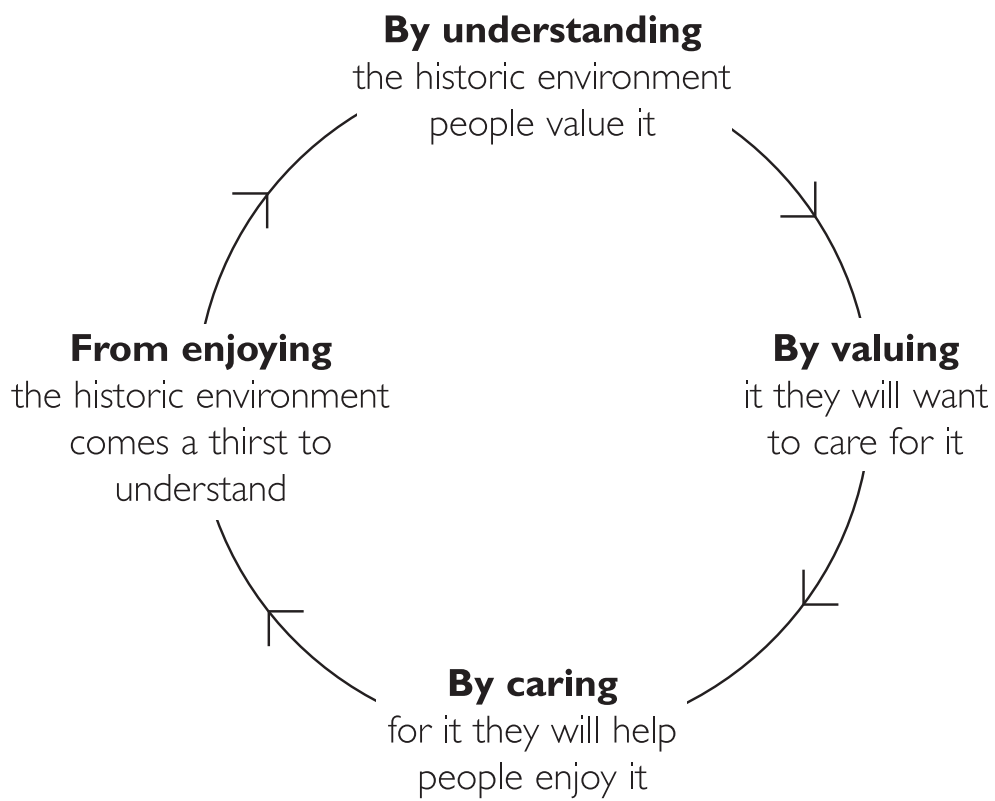
Our main purpose in producing these *Principles, Policies and Guidance* for the sustainable management of the historic environment is to strengthen the credibility and consistency of decisions taken and advice given by English Heritage staff, but our success will also be measured by the extent to which they are taken up by the sector as a whole. Over time, we hope that the document will help to create a framework for managing change in the historic environment that is clear in purpose, and transparent and sustainable in its application.

**Sir Neil Cossons**

Chairman

English Heritage

## The heritage cycle



# THE CONSULTATION

This consultation takes the form of a draft final document.

Our questions can be found on page 63.

Information on how to respond to the consultation is on page 67 and we have included the Government's Code of Practice on Consultation on page 69, for your information.

The closing date for responses is 11 May 2007

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# INTRODUCTION

## AIMS

The historic environment is a resource that should be sustained for the benefit of both present and future generations. Our aim is to provide a logical approach to making decisions and offering guidance on a consistent basis about any and all aspects of the historic environment, and for balancing its protection with the economic and social needs and aspirations of the communities who live in it. These *Conservation Principles, Policies and Guidance* offer both a response to the limitations of the existing separate designation and management regimes, and a contribution to their proposed rationalisation, following the modernisation of spatial planning through Local Development Frameworks.

The *Principles* are primarily intended to help English Heritage achieve greater consistency of approach in carrying out its statutory role as the Government's advisor on the historic environment in England. They will guide our staff in fulfilling our role in the development process, and in managing the historic sites in our care. We hope, of course, that, like all English Heritage guidance, they will be read and used by local authorities, property owners, developers, and their advisers. In due course, the *Principles, Policies and Guidance* will be supported by further, more detailed guidance on their application to particular types of proposal or place.

## OVERVIEW

The *Principles, Policies and Guidance* provide a framework for sustainable management of the historic environment, the essence of which is addressed in Principle 1. Principle 2 emphasises the potential for everyone to contribute to sustaining the historic environment. Principle 3 addresses the idea of the heritage values of places, and the concept of significance as the sum of those values. It is supported by guidance which proposes a 'family' of heritage values and a process for assessing significance. Principle 4 defines conservation as managing change in ways that will sustain the significance of places. It is supported by policies and guidance that explain its application to an escalating range of actions, taking into account Principles 5 and 6, which are concerned with decision-making and the value and use of records. Whilst some of these policies have a close relationship to particular principles (for example 'New work and alteration' to Principle 4.6), it is important that each is seen as a specific application of the *Principles* as a whole. Finally, the *Principles* acknowledge that the cultural and natural heritage values of places should be considered in parallel, fostering close working relationships between managers of cultural and natural heritage interests.

## CONCEPTS AND TERMS

Throughout the document, we have used the word 'place' to describe any immovable part of the historic environment (including under the ground or sea) that people perceive as having a distinct identity. It can be of any scale, from a milestone to a building, an historic area, a town, or a region. We have deliberately not used the terminology of current law and public policy relating to particular heritage designations, such as 'listed building' and 'scheduled monument'. This is both in anticipation of the consolidation of the present systems of heritage protection, and to avoid the suggestion that the *Principles* are concerned only with places that meet the particular thresholds of significance necessary for national or local designation. Beyond heritage designations, in the wider context of environmental management and spatial planning, an understanding of the heritage values a place has for its owners, the local community and wider communities of interest should be seen as the basis for making sound decisions about its future.

Sustainable management of a place begins with understanding and articulating how, why, and to what extent it has heritage values – its significance. Communicating that significance to everyone concerned with a place, and particularly to people whose actions may affect it, is then essential if they are to act in awareness of those heritage values. Only through understanding the significance of a place is it possible to assess how the qualities that people appreciate are vulnerable to harm or loss. That understanding should then provide the basis for developing and implementing management strategies (including maintenance, cyclical renewal and repair) that will best sustain the heritage values of the place in its setting.

Our definition of conservation includes the objective of sustaining the heritage values. In managing places that have heritage values, 'to preserve', even its established legal definition of 'to do no harm', is only one aspect of what is needed to sustain these values. The conservation area concept, with its requirement 'to preserve or enhance', also recognises that potential often exists for beneficial change, to reveal and reinforce value. 'To sustain' embraces both aspects to the extent that the values of a place allow. Change offers the potential to enhance and add value to places, as well as generating the need to protect their established heritage values. It is the means by which each generation aspires to enrich its historic environment, to make changes that will, in turn, be valued by the generations to come.

## RELATIONSHIP TO OTHER POLICY DOCUMENTS

Planning Policy Statement 1 *Delivering sustainable development* (2005) includes the explicit objective of 'protecting and enhancing the natural and historic environment' (paragraphs 5, 17-18). In these *Principles, Policies and Guidance*, we provide detailed guidance on sustaining the historic environment within the framework of established government policy. In particular, the document distils from Planning Policy Guidance (PPG) note 15 *Planning and the historic environment* (1994) and PPG16 *Archaeology and planning* (1990) those general principles which are applicable to the historic environment as a whole. It also provides a framework within which other current English Heritage policy and guidance should be applied, not least *Informed Conservation*,<sup>1</sup> which specifically addresses conservation management.

At the international level,<sup>2</sup> the *Principles* reflect many of the presumptions of the *World Heritage Convention*, with its call to give all natural and cultural heritage a function in the life of communities. They are consistent with the *Granada Convention* on the protection of the architectural heritage, and the *Valletta Convention* on the protection of the architectural heritage, both ratified by the United Kingdom. The *European Landscape Convention*, now also ratified by the United Kingdom, has been influential, not least for its definition of a landscape as 'an area, as perceived by people...', and its references to the need to consider sustaining cultural values in managing all landscapes and the importance of public engagement in the process.

<sup>1</sup> Kate Clark, *Informed Conservation: Understanding historic buildings and their landscapes for conservation* (English Heritage, 2001)

<sup>2</sup> *Convention concerning the Protection of the World Cultural and Natural Heritage* (UNESCO, 1972)

*Convention for the Protection of the Architectural Heritage of Europe* (Granada: Council of Europe, 1985, ETS 121)

*European convention on the Protection of the Archaeological Heritage* (Valletta: Council of Europe, 1992, ETS 143)

*The European Landscape Convention* (Florence: Council of Europe, 2000, ETS 176)

# CONSERVATION PRINCIPLES

FOR THE SUSTAINABLE MANAGEMENT OF THE HISTORIC ENVIRONMENT

## **I The historic environment is a shared resource**

**1.1** Our environment is historic because it has been shaped by people responding to the surroundings they inherit. It contains a unique and dynamic record of past human activity, which reflects the aspirations, skills and investment of successive generations.

**1.2** People value this historic environment as part of their cultural and natural heritage. It reflects the knowledge, beliefs and traditions of diverse communities. It gives distinctiveness, meaning and quality to the places in which we live, providing a sense of continuity and a source of identity. It is a social and economic asset and a resource for learning and enjoyment.

**1.3** Each generation should therefore sustain and shape the historic environment in ways that allow people to use, enjoy and benefit from it, without compromising the ability of future generations to do the same.

**1.4** Heritage values express the public interest in our historic environment, regardless of ownership. Use of law and public policy to the extent necessary to protect that public interest is justifiable if it is supported by advice and assistance to help owners to sustain the heritage.

## **2 Everyone should be able to participate in sustaining the historic environment**

**2.1** Everyone should have the opportunity to contribute to understanding and sustaining the historic environment. Judgements about the values of places and decisions about their future should be made in ways that are accessible, inclusive and informed.

**2.2** Learning is central to sustaining the historic environment. It raises people's awareness and understanding of their heritage, including the varied ways in which its values are perceived by different generations and communities. It encourages informed and active participation in caring for the historic environment.

**2.3** Experts should use their knowledge and skills to help and encourage others to learn about, value and care for the historic environment. They play a crucial role in discerning, communicating and sustaining the established values of places, and in helping people to refine and articulate the values they attach to places.

**2.4** It is essential to develop, maintain and pass on the specialist knowledge and skills necessary to sustain the historic environment.

### 3 Understanding the heritage value of places is vital

**3.1** Any part of the historic environment with a distinctive identity perceived by people, whatever its scale, can be considered as a place.

**3.2** In order to identify the heritage values of a place, it is necessary first to understand its fabric, and how and why it has changed over time; and then to consider

- who values the place, and why they do so
- how those values relate to its fabric
- their relative importance
- whether they are enhanced by associated objects
- the contribution of the setting and context of the place to its values
- how well the place compares with others sharing similar values.

**3.3** Significance embraces all the cultural and natural heritage values that people associate with a place, or which prompt them to respond to it. Such values tend to grow in strength and complexity over time, as people's perceptions of a place evolve.

**3.4** The purpose of understanding and articulating the significance of a place is to inform decisions about its future. The degree of significance determines what, if any, protection is appropriate under law and policy.

## **4 Significant places should be managed to sustain their values**

**4.1** Change in the historic environment is inevitable, whether caused by natural processes, through use, or by people responding to social, economic and technological advances.

**4.2** Conservation is the process of managing change in ways that will best sustain the significance of a place in its setting, while recognising opportunities to reveal or reinforce its values for present and future generations.

**4.3** Conservation is achieved by everyone concerned with managing a significant place sharing an understanding of its significance, and using it to

- judge how its heritage values are vulnerable to change
- take the actions and impose the constraints necessary to sustain, reveal and reinforce those values
- mediate between conservation options, if action to sustain one heritage value could conflict with action to sustain another
- ensure that the place retains its authenticity – those attributes which most truthfully reflect and embody the heritage values attached to it.

**4.4** Action taken to counter harmful effects of natural change, or to minimise the risk of disaster, should be timely, proportionate to the severity and likelihood of identified consequences, and sustainable in the long term.

**4.5** Intervention that causes limited harm to the values of a place may be justified if it increases understanding of the past, reveals or reinforces particular heritage values, or is necessary to sustain those values for future generations, so long as any harm is decisively outweighed by the benefits.

**4.6** New work should aspire to a quality of design and execution, related to its setting, which may be valued both now and in the future. This neither implies nor precludes working in traditional or new ways, but demands respect for the significance of a place in its setting.

## **5 Decisions about change must be reasonable, transparent and consistent**

**5.1** Decisions about change in the historic environment demand the application of expertise, experience and judgement by those advising on and making decisions, in a consistent, transparent process guided by public policy.

**5.2** The range and depth of understanding, assessment and public engagement should be sufficient for the impacts of change on the significance of a place to be fully understood, but efficient in the use of resources.

**5.3** Potential conflict between sustaining the significance of a place and other public interests should be minimised by seeking the least harmful means of accommodating those interests.

**5.4** If conflict cannot be avoided, the weight given to heritage values in making the decision should be proportionate to the significance of the place and the impact of the proposed change on it.

## **6 Recording and learning from decisions is essential**

**6.1** Keeping records of the justification for decisions and the actions that follow them is crucial to maintaining a cumulative account of what has happened to a significant place, and understanding how and why its significance may have been altered.

**6.2** Managers of significant places should monitor and regularly evaluate the effects of change and their responses to it, and use the results to inform future policy and decisions.

**6.3** If all or part of a significant place will be lost as a result of formal decision or inevitable natural process, its potential to yield information about the past should be realised. This involves investigation and analysis, followed by archiving and dissemination of the results, at a level that reflects its significance.

**6.4** Where such loss is the direct result of human intervention, the costs of this work should be borne by those who benefit from the change, or whose role is to initiate such change in the public interest.

# UNDERSTANDING VALUES AND ASSESSING SIGNIFICANCE

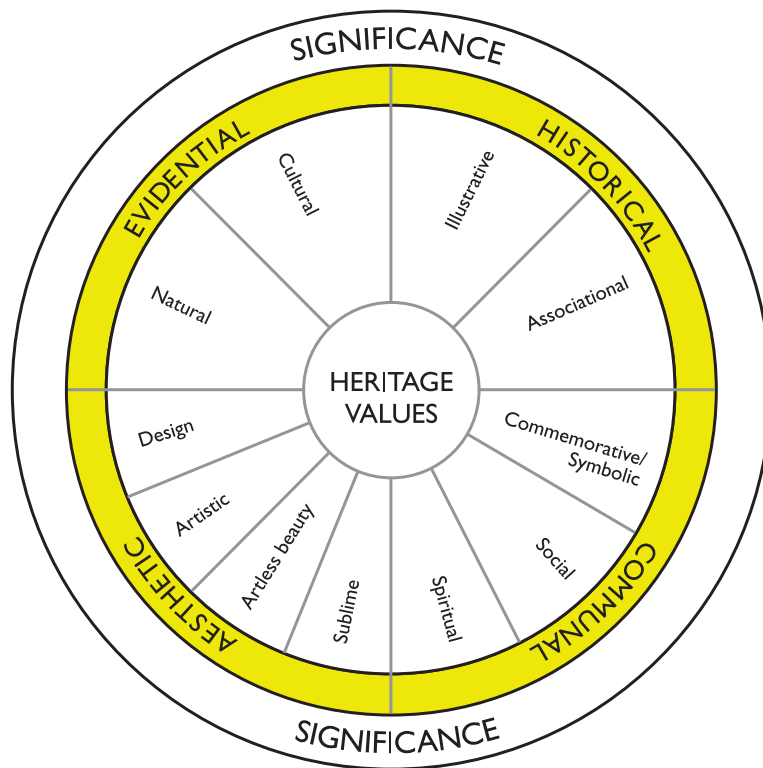
## Preamble

- 1 People may value a place for many reasons: its distinctive architecture or landscape, the story it can tell about its past, its association with notable people or events, its landform, flora and fauna, because they find it beautiful, awesome or inspiring, or for its role as a focus of an established community. These are examples of heritage values that people want to enjoy and sustain for the benefit of future generations.
- 2 Many cultural and natural heritage values are recognised by the statutory designation and regulation of places where a particular value, such as 'architectural or historic interest', is judged to be above a defined threshold of importance. However, there are multiple heritage values attached to many places, all of which should influence management decisions.
- 3 Heritage values can generate social and economic benefits for places, for example as a learning or recreational resource, or as a generator of tourism or inward economic investment, although their potential to do so is affected by other factors, such as ease of access to a place.<sup>3</sup> Most places with heritage values are used, or are capable of being used, for some practical purpose. Their heritage values are often reflected in higher market values compared to otherwise similar places. Places with heritage values also tend to contribute to perceptions of the quality of a much wider area, and so help to increase the market value of other property within it – the principle underlying conservation-based economic regeneration.

<sup>3</sup> These benefits are often called 'instrumental' values, in contrast to the 'intrinsic' cultural and natural heritage values with which this section is concerned.

## A family of heritage values

- 4 This section is not intended as the definitive checklist of heritage values, but to prompt comprehensive thought about the values of a place. The high level values or 'family' headings – evidential, historical, aesthetic and communal – move in general terms from more objective to more subjective – from evidential value that is dependent on the inherited fabric of places, to communal values which derive from people's identity with them.
- 5 Some values can be appreciated as culturally-conditioned responses (for example, an aesthetic response to a view), but experience of all heritage values tends to be deepened through specific knowledge about the place.



The significance of a place is the sum of its heritage values

**Evidential value**

- 6 Evidential value relates to the potential of a place to yield primary evidence about past human activity.
- 7 Material remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them. They are part of a unique record of our past that begins with traces of early man and continues to be created and destroyed. Their evidential value is proportionate to their potential to contribute to our understanding of the past.
- 8 In the absence of written records, the material record, particularly archaeological deposits, provides the only source of evidence about the distant past, and of poorly documented aspects of the more recent past. The fabric of any place, however recent, is the primary record of its evolution. Age, although not paramount, is therefore a strong indicator of relative evidential value, which includes potential for research in other disciplines, particularly the sciences. Geology, landforms, species and habitats similarly have value as sources of information about the evolution of the planet and life upon it.
- 9 Evidential value resides in the actual remains or genetic lines that have been inherited from the past. The ability to interpret the evidence using contemporary techniques is generally diminished to the extent that these remains or lines have been removed or replaced.

**Historical value**

- 10 Historical value relates to the ways in which the present can be connected through a place to past people, events and aspects of life. It tends to be *illustrative* or *associative*.
- 11 The idea of illustrating aspects of history – the perception of a window that provides links between past and present people – is different from purely evidential value. An historic building that is one of many similar examples may provide little unique evidence about the past, but each example illustrates its builder's intentions equally well. Illustrative value has the power to aid interpretation of the past through making connections with, and providing insight into, past people and events through shared experience. The illustrative value of places is particularly important if they incorporate the first, or only surviving, example of an innovation of consequence, whether related to design, technology or social organisation, or if it is one which has survived as an exemplar of its type.

- 12 The concept of illustrative value is as applicable to the natural as to the cultural heritage values of a place; examples range from geological strata visible in an exposure to the interdependence of species in a particular habitat. Illustrative value is often described in relation to the subject illustrated, for example, an innovative structure might be said to have 'technological value', or a quarry face 'geological value'.
- 13 Historical value takes on a particular resonance where a place is associated with an important person, event, or movement. Being at the place where something momentous happened can trigger the imagination and emotions, and provide insights through linking historical accounts of events with the place where they happened – provided, of course, that the place still retains some resemblance to its appearance at the time. The way in which a person built or furnished their house, or made a garden, often provides insight into their personality. It can suggest aspects of their character and motivation that extend, or even contradict, what they or others wrote at the time, and so also provide evidential value.
- 14 Many landscapes are associated with the development of other aspects of cultural heritage such as literature, art, music or film. Perceptions of these associative values tend in turn to inform our responses to those landscapes. Associational value also attaches to places closely connected with the work of people who have made important discoveries or advances in thought about the natural world.
- 15 The historical value of places depends upon direct experience of elements that have survived from the past, but it is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in its visible adaptation to meet changing requirements. Historical values are harmed only to the extent that that adaptation has obliterated or concealed them.
- 16 The purpose for which a place is currently used may make a major contribution to its historical value, for example as a public park, a church or a theatre. The cessation of the use for which a place was designed, or the way in which it is managed, can seriously diminish its historical value. In the case of some specialised landscapes and buildings, it can essentially destroy it. Conversely, abandonment, as, for example, deserted medieval villages or ruined monastic houses, may illustrate important historic events.

### **Aesthetic value**

- 17 Aesthetic value relates to the ways in which people derive sensory and intellectual stimulation from a place.

- 18 Aesthetic values can be the result of the conscious design of a place and artistic endeavour. Equally, they can be the fortuitous result of the way in which a place has evolved, or has been used and valued over time. Many places combine these aspects – for example, where the qualities of an attractive landscape have been reinforced by artifice. Aesthetic values include not only the beautiful, but also the sublime, in the sense of inspiring awe or fear. Aesthetic values tend to be culturally specific, but this does not mean that appreciation of them is culturally exclusive.
- 19 *Design value* relates primarily to the aesthetic qualities generated by the conscious design and stewardship of a building, structure or landscape as a three-dimensional whole. Design value embraces composition (form, proportions, massing, silhouette, views and vistas) and usually also materials or planting, decoration or detailing, and craftsmanship. It may extend to the intellectual programme governing the design and the choice or influence of sources from which it was derived. It may be the work of a known patron, architect, designer, gardener or craftsman, or a mature product of a vernacular tradition of building or land management.
- 20 Sustaining design value tends to depend on maintaining the integrity of the designed concept. Where the design was conceived and set out for execution by others, it may be possible to make good subsequent damage by following the original instructions in the original way.
- 21 Architectural value is the aspect of design value that is most readily recognised in the historic environment. Strong indicators of significance are age, rarity and completeness, quality of design and craftsmanship, and innovation, particularly in the mainstreams of architectural design.
- 22 *Artistic value* overlaps considerably with design value, but it can be useful to draw a distinction between design through detailed instructions (like architectural drawings) and the creation of a work of art in which the designer is also in significant part the craftsman. The value of such a work is proportionate to the extent that it remains the actual product of the artist's hand. While the difference between design and artistic value can be clear-cut, for example statues in niches on a formal building, it is often far less so, as with repetitive ornament on a medieval building.

- 23 Any aesthetic value that is not the result of conscious design might be called 'artless beauty', or more prosaically, fortuitous aesthetic value. It includes the seemingly organic form of an urban or rural landscape and the relationship of its buildings, structures and their materials to their setting; the harmonious (but not consciously designed) relationship of one building to another; or an attractive quality arising from the juxtaposition of buildings in their setting. Design in accordance with picturesque theory is best considered a design value.
- 24 Artless beauty often derives from a combination of natural and artificial elements, or the action of nature on human works. Such value, particularly the ways in which the appearance of a place is enhanced by the passage of time ('the patina of age'), may overlie the aesthetic values of a conscious design and, in consequence, add to the range and depth of values, and thus the significance, of the whole. Sometimes, however, they may be in conflict.
- 25 Aesthetic values may be related to the age of a place, but, apart from artistic values, they may be amenable to restoration and enhancement. This reality is reflected both in the definition of conservation areas (areas whose 'character or appearance it is desirable to preserve or enhance') and in current practice in the conservation of historic landscapes.
- Communal value**
- 26 Communal value relates to the meanings of a place for the people who relate to it, and whose collective experience or memory it holds. Communal values are closely bound up with historical (particularly associational) and aesthetic values, but tend to have additional and specific aspects.
- 27 *Commemorative* and *symbolic values* reflect the meanings of a place for those who identify with it or have links to it. The most obvious examples are war memorials and public statues, which consciously evoke past lives and events, but some buildings and places, like the Palace of Westminster, symbolise wider values. Such values are not always positive; a place may be all the more important for reminding us of uncomfortable events, attitudes or periods in our history. They are important aspects of our collective memory and identity, places of remembrance whose meanings should not be forgotten. In some cases, that meaning can only be grasped through information and interpretation, whereas in others the character of the place itself tells most of the story.

- 28 *Social value* is associated with places that are perceived as a source of identity, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time and the collective memory of stories linked to them. They tend to gain value through the resonance of past events in the present, providing reference points for a community's identity or sense of itself. They may have fulfilled a community function that over time has developed into a deeper attachment, or shaped some aspect of community behaviour or attitudes. Such places are usually in the public domain. Social value can also be expressed on a large scale, with great time-depth, through regional and national identity.
- 29 The social values of places are not always clearly recognised by those who hold them, and may only be articulated when a particular place is under threat. They may relate to an activity that is associated with the place, rather than with its physical fabric. The social value of a place may have no direct relationship to any formal historical or aesthetic values that may have been ascribed to it. Social value can also survive, and may even encourage, replacement of the original physical structure, so long as its key social and cultural characteristics remain intact.
- 30 Compared with other heritage values, social values are thus generally less dependent on the survival of historic fabric. They can be the popular driving force for the re-creation of lost (and often deliberately destroyed or desecrated) places with high symbolic value, but this is rare in England.
- 31 *Spiritual value* attached to places can emanate from the beliefs and teachings of an organised religion, or reflect present-day perceptions of the spirit of place. It includes the sense of inspiration and wonder that can arise from personal contact with places revered over many generations, or places newly revealed.
- 32 Spiritual value is often associated with places long sanctified by veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the authentic fabric or character of the place from the past, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there.

## The process of assessing significance

### **Understand the fabric and evolution of the place**

33 To identify the heritage values of a place, its fabric and character must first be understood. This should include its origins, how and why it has changed over time (and will continue to change if undisturbed), the form and state of its constituent elements and materials, any habitats it provides, and how and why it differs from other places.

34 Study of material remains alone will rarely provide sufficient understanding of a place. The information gained will need to be related to the successive social and cultural circumstances that produced the place. Documentary evidence almost always helps to understand how and why the place has changed over time, as may oral history, and is fundamental to identifying associational aspects of historical value.

35 Historic Environment Records play a vital role in developing a comprehensive and dynamic information resource, both for understanding particular places and as a wider research tool. Key elements of documentation generated through understanding places, and making changes to significant places, should be copied to Historic Environment Records, as well as remaining accessible to everyone directly concerned with the place.

36 Characterisation can provide a useful tool for rapidly mapping, describing, analysing and understanding areas. Its aim is to make the past visible in everyday surroundings by identifying the distinctive historic elements of an area, and providing the wider context for particular places within it.<sup>4</sup>

### **Identify who values the place, and why they do so**

37 To provide a sound basis for decision-making, the full range of heritage values that people attach to a place should be understood and articulated, not just those that may be a focus of contention. This involves identifying and engaging with people with an expert knowledge of particular aspects of the place, as well as all who have an interest in it and its future.

38 Different people and communities may assign different weights to the same heritage values of a place at the same time. It is important to remember that heritage value judgements, especially about the recent past, tend to grow in strength and complexity over time, as people's perceptions of a place evolve. It is therefore a valid role of experts to consider whether a place might be so valued by future generations that it should be protected now.

<sup>4</sup> See *Boundless Horizons: Historic Landscape Characterisation and Using Historic Landscape Characterisation* (English Heritage, 2004) and at a more detailed level, *Guidance on conservation area appraisals* (English Heritage, 2006).

39 The process of investigating places often generates and helps to define perceptions of their heritage values. This may happen through physical discoveries, but the articulation of links between the qualities of a particular place and the evolution of the culture that produced it, or the events that happened there, may be more important.

**Relate identified heritage values to the fabric of the place**

40 An assessment of significance will normally need to identify how particular parts of a place and periods in its evolution contribute to, or detract from, each identified heritage value. The most useful categories for differentiating between the components of a place ('what') are temporal ('when', often linked to 'by whom') and spatial ('where', often linked to 'why'). Understanding a place should produce a chronological sequence of varying precision, allowing its surviving elements to be ascribed to 'phases' in its evolution. Some phases are likely to be of greater significance than others, for example:

'The evidential value and potential of Smith's Hall lies primarily in the timber-framed elements of the medieval hall house and 16th century cross-wing, and to a moderate extent in the 18th century alterations and casing. The latter is, however, of high architectural value, marred only by superficial 20th century accretions.'

41 In other cases, differentiation will be spatial, for example:

'The street block of the factory was designed by A N Other to demonstrate the architectural potential of the company's terracotta; it is a bold and well-proportioned design which was followed by others in the district. Its architectural value is reinforced by the technological [ie illustrative historical] value of the fireproof construction of the floors using hollow pots. The rear block, although it followed soon afterwards, is by contrast architecturally entirely typical of its date and place. While of lesser architectural value, it and the other buildings on the site, each of which fulfilled a specific role in the manufacturing process, are collectively of high evidential and historical value.'

42 In many cases, differentiation will be a combination of the spatial and the temporal, and will best be illustrated by maps and plans showing the age and relative significance of the components or character areas of a place.

**Consider the relative importance of those identified values**

43 Sustaining all the identified heritage values of a place will not always be possible, not least because some values may be conflicting or contradictory. If so, understanding the relative contribution of each identified heritage value to the overall value of the place – its significance – will be essential to decision-making.

- 44 As the 'Smith's Hall' example demonstrates, some elements of a place may actually detract from its significance. Eliminating or mitigating negative characteristics may help to reveal or reinforce heritage values of a place and thus its significance.

### **Consider the contribution of associated objects and collections**

- 45 Historically-associated objects can make a major contribution to the values of a place, and association with a place can add cultural value to those objects. The range of associated objects includes, but is not limited to, archaeological artefacts recovered through fieldwork, artworks and furnishings, collections, tools and machinery, and related archives, both historical and archaeological. The value of the whole is usually more than the sum of the parts, so that permanent separation devalues both place and objects. The contribution of such objects and archives should be articulated, even if they are currently held elsewhere.

- 46 Where places have been created around collections (for example, museums or libraries), or the interior of a room or part of a garden was designed as an entity (including furniture or sculpture, as well as immovable elements), or an industrial building was designed around specific machinery, the relationship between objects and the place is fundamental to the significance of the whole.

### **Consider the contribution of setting and context**

- 47 'Setting' is an established concept that relates primarily to the surroundings in which a place is experienced, while embracing an understanding of perceptible evidence of the past in the present landscape. Definition of the setting of a significant place will normally be guided by the extent to which material change within it could affect (enhance or diminish) the place's significance.

- 48 'Context' embraces any relationship between a place and other places. It can be, for example, temporal, functional, intellectual or political, as well as visual, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity or group.

### **Compare the place with other places sharing similar values**

- 49 Understanding the importance of a place by comparison with other places demonstrating similar values normally involves considering:
- how well are the identified heritage values demonstrated or represented by the place, compared with other places?
  - how do its values relate to statutory designation criteria, and any existing statutory designations?

- 50 Statutory designation in a national or local context is an important indicator of the significance of a place; but the absence of designation does not necessarily imply low significance. Archaeological remains of national importance are often managed through the planning system, and detailed research and analysis may reveal new evidence about any place. The heritage values of a place established through detailed study should therefore normally be compared with current selection criteria for designation, or the application of protective policies.
- 51 Value judgements about our historic environment have implications for both places and everyone with an interest in them. Such judgements provide the basis for decisions about whether, or to what extent, a place should be conserved, rather than remade or replaced. Statutory protection may have important financial and other implications for owners, while the refusal of it may mean the loss of a place to which some people attached great heritage value. Detailed criteria for statutory designation, periodically updated, and a methodical articulation of how a particular place does or does not meet such criteria, make a major contribution to achieving the consistency of judgement that is crucial to public acceptability and fairness.
- 52 The fact that a place does not meet current criteria for formal designation does not negate its values to particular communities. These values should still be taken into account in making decisions about its future through the spatial planning system, or incentive schemes like Environmental Stewardship.
- Draft a statement of significance**
- 53 The 'statement of significance' of a place is an overview of all the heritage values attached to it by all who have an interest in it. It should explain the relative importance of those values (where appropriate by reference to criteria for statutory designation), how they relate to its physical fabric, and identify any tensions between potentially conflicting values. It should guide every decision about change to a significant place.
- 54 For a complex place, assessing the full range of heritage values will involve the participation of owners, communities and experts with a wide range of knowledge and expertise. A balanced view of significance, particularly where values conflict, is best achieved through enabling all interested parties to appreciate their differing perspectives and priorities.

# CONSERVATION POLICIES AND GUIDANCE

## Preamble

55 Conservation involves sustaining, revealing or reinforcing the heritage values of a place in its setting (Principle 4.2). It is not limited to physical intervention, and should be active as well as reactive. It may involve minimising change, but equally may be achieved through making major changes. Change to a significant place is only harmful if (and to the extent that) its significance is eroded.

<sup>5</sup> Kate Clark, *Informed Conservation: Understanding historic buildings and their landscapes for conservation* (English Heritage, 2001) sets out techniques that can assist with this process of 'system-guided judgement', including heritage impact assessment and options appraisal.

56 Decisions about change to a place may involve balancing the heritage value(s) of what exists now against the potential benefits and disbenefits of the proposed change, and the public interest in the historic environment (Principle 1.4) with other public interests. There is rarely a single right answer; so adequacy of information and consistency of process are crucial to reaching publicly-justifiable decisions. <sup>5</sup>

## Universal considerations

### **Authenticity and integrity**

57 Evidential value, historical values and some aesthetic values, especially artistic ones, are dependent upon a place retaining (to varying degrees) the actual fabric that has been handed down from the past; but authenticity (as defined in Principle 4.3) can relate to design as well as fabric. Design values, particularly those associated with landscapes or buildings, may be harmed by losses brought about by disasters, physical decay, or through ill-considered alteration or accretion. The design may be recoverable through repair or restoration, but perhaps at the expense of evidential value. Retaining the authenticity of a place is therefore not always achieved by retaining as much of the existing fabric as is technically possible. It always requires an understanding of the range and importance of the heritage values involved and what is necessary (and possible) to sustain each of them.

58 Integrity (literally, 'wholeness, honesty') can apply, for example, to a structural system, a design concept, the way materials are used, the character of a place, historical continuity (showing passage of time through adaptation to changing needs), artistic creation, or functionality.

59 Every place is unique in its combination of heritage values, but the value of physical fabric tends to be strongly linked to its location. While it is technically possible to relocate some discrete historic entities, such as buildings or structural monuments, their heritage values are usually diminished by separation from their original location and context.

- 60 Reinstating damaged elements of work directly created by the hand of an artist normally runs counter to the idea of authenticity and integrity. However, the reinstatement of damaged architectural or landscape features in accordance with the original design evidenced by the fabric of a place may not do so, if the artistic creation was the design itself, intended to be realised by someone other than the designer. Authenticity lies in whatever most truthfully reflects and embodies the values attached to the place.
- 61 Habitats are to varying degrees sensitive to change. Some can be recreated relatively easily, while others, once lost, are difficult, if not impossible, to recover. Most habitats in England are the result of long-established land management practices, and may be at risk if these are changed or abandoned.
- 62 A desire to retain authenticity tends to suggest that any deliberate change to a significant place should be distinguishable, that is, its extent should be discernible through inspection. The degree of distinction that is appropriate must take account of the aesthetic values of the place, and not spoil them. In order to retain the coherence of the whole, a subtle difference between new and existing, comparable to that often adopted in the presentation of damaged paintings, is likely to be preferable to jarring contrast.
- 63 Ensuring continuity of an established use may be vital to sustaining the authenticity of a place, if that use makes a major contribution to its heritage values. This can be so even if, for example, it means replacing parts in an historic machine to enable it to continue to operate as intended, physically accommodating changes in the way a congregation uses a church, or ensuring that a theatre can continue to function as such. Aspects of integrity may sometimes need to be compromised to sustain aspects of authenticity. The statement of significance should guide decisions.

<sup>6</sup> In the words of William Morris in the *Manifesto* of the Society for the Preservation of Ancient Buildings (1877), 'to stave off decay by daily care'...

- Sustainability and reversibility**
- 64 Sustainability embraces the stewardship of places of established value. It requires using and managing them in ways that will, wherever possible, ensure that their significance can be appreciated by generations to come. Sustaining the value of the historic environment as a whole also embraces changes intended to reinforce, enhance and enrich the heritage values of places. Both involve anticipating the heritage values of future generations, as well as understanding those of our own.

- 65 Our ability to judge the long-term impact of changes on the significance of a place is limited. Interventions may not perform as expected. Future generations may not consider their effect on heritage values positive, as perceptions of significance evolve. It is therefore desirable that changes are capable of being reversed, in order not unduly to prejudice options for future generations.
- 66 It is unreasonable, however, to take this approach to the point that new work in significant places diminishes their aesthetic values by appearing contrived, awkward or ugly. Crude and intrusive changes, unless of very short duration, are certainly not justifiable simply because they are theoretically temporary or reversible; 'temporary' solutions too readily become permanent. Equally, places should not be rendered incapable of a sustainable use because of a reluctance to make modest but irreversible changes.

## Routine management and maintenance

- 67 **The continuation or reinstatement of appropriate routine management and maintenance is the foundation of the conservation of significant places.**
- 68 The heritage values of landscapes and buildings are quickly obscured or lost if long-standing management regimes, often closely linked to the original design concept, are discontinued. Archaeological deposits, earthworks and masonry need continuous management to limit degradation by plant and animal action. Since many places embody both natural and cultural heritage values, sustaining their ecosystems can depend upon continuing an historic management regime. Reinstating a lapsed regime can help to recover both cultural and natural heritage values.
- 69 Good management requires understanding and regular monitoring of the physical condition of a place, in order both to evaluate the effects of major change and cyclical maintenance, and to ensure that problems which have the potential to result in major harm are identified and dealt with promptly.<sup>6</sup> Monitoring aids better understanding of the outcomes of previous actions, informing continual improvement of planned maintenance and identifying the need for periodic repair at an early stage.
- 70 If a permanent solution to identified problems is not immediately possible, temporary work should be undertaken to prevent them escalating. The key criteria for temporary solutions are effectiveness, speed and reversibility.

## Periodic renewal

- 71** Periodic renewal intended or inherent in the original design of a significant place should be acceptable unless it involves harm to heritage values that will not be recovered during the following cycle.
- 72 Periodic renewal, like re-covering roofs, differs from maintenance in that it occurs on a longer cycle and often has a greater visual impact. It involves the temporary loss of certain heritage values, such as the aesthetic value of the patina of age on an old roof covering, or the biodiversity value of an aging tree; but these values are likely to return within the next cycle, provided the replacement is physically and visually compatible. By contrast, the consequence of not undertaking periodic renewal is normally permanent loss of fabric and associated heritage values.
- 73 The justification for periodic renewal will normally be that the fabric concerned is becoming incapable of fulfilling its intended function through more limited intervention; and additionally, in the case of landscapes, that succession planting cannot achieve the objective in a less dramatic way. Harm to values that will normally be recovered during the next cycle can in most cases be discounted, but permanent harm cannot be ignored.

## Repair, including adaptation to sustain significance

- 74** Repair and adaptation intended to sustain the heritage values of a significant place should be acceptable if all the following criteria are met:
- there is sufficient information about the place fully to understand the impacts of the proposals on its significance;
  - the heritage values that would be affected have been identified, and their relative importance to the place understood;
  - the long term effects of the proposals can, from experience, be predicted to be benign, or are designed not unduly to prejudice other options in the future;
  - harm arising from conflicting requirements to sustain different heritage values has been avoided, or minimised through considering both the relative importance of the values affected and the impact on them.

- 75 It is important to look beyond the immediate need for action, and to plan for the long-term consequences of inevitable change and decay. Sometimes, action necessary to sustain or reinforce one value can conflict with what is necessary to sustain others. Understanding the range, inter-relationships and relative importance of the heritage values associated with a place provides a framework for reconciling or balancing such tensions. While every reasonable effort should be made to avoid or minimise potential conflict, contrived solutions requiring intensive maintenance are likely to be difficult to sustain.
- 76 Changes designed to lessen the risk or consequences of disaster require a balance to be struck between the possibility of major harm to heritage values without them, and the certainty of the lesser but often material harm caused by the works themselves. The need for physical precautions should be considered in the context of disaster response and recovery planning for the place as a whole, based on risk assessment and management, and any statutory requirements. All options should be evaluated, including improved management as an alternative to, or in conjunction with, lower levels of physical intervention.
- 77 The use of materials or techniques with proven longevity, and which are close matches for those being repaired or replaced, tends to carry a low risk of future harm. By contrast, the long-term effects of using materials or techniques that are innovative and relatively untested are much less certain.
- 78 Not all historic materials or techniques were durable – iron cramps in masonry, or un-galvanised steel windows, for example, are both subject to corrosion. Some structural failures are inevitable, if slowly developing, consequences of the original method of construction. Once failure occurs, stabilising the structure depends on addressing the underlying causes of the problem. Sometimes the use of original materials and techniques for repair can destroy more of the original fabric, and any decoration it carries, than the introduction of reinforcing or sacrificial modern materials. Their use may offer the optimum conservation solution if it allows more significant fabric to be retained. In making decisions, it is essential to understand all the heritage values of the elements concerned, and to consider carefully the long-term as well as the immediate conservation objectives.

- 79 The re-use of sound materials derived from the place being repaired or altered is traditional practice and contributes to the sustainable use of energy and material resources. Mixing old and new materials in situations subject to serious weathering, however, may be inadvisable. Maintaining demand for traditional materials will also stimulate their continued or renewed production, and help to ensure a sustainable supply.
- 80 The re-use of sound traditional materials recovered from alteration and demolition elsewhere can also contribute to sustainability, but it is important to ensure that they are not derived from degrading other significant places because of the value of their materials, whether lawfully or by theft.

## Intervention to increase knowledge of the past

- 81 **Intervention in significant places primarily to increase knowledge of the past should not involve material loss of their evidential value unless:**
- preservation *in situ* is not reasonably practicable; or
  - the potential increase in knowledge is
    - unlikely to be achieved from a place that cannot practically be preserved; and
    - the gain is predicted decisively to outweigh the loss of the primary resource.
- If acceptable, an intervention demands:**
- a competent and adequately resourced team, working to a project design based on explicit research objectives;
  - funded arrangements for the subsequent conservation and public deposit of the site archive, and for appropriate analysis and dissemination of the results within a set timetable;
  - a strategy to ensure that other parts of the place are not prejudiced by the work, whether at the time or subsequently.
- 82 The historic environment is a unique record of past human activity, but differs from written archives in that 'reading' some parts of it, particularly buried archaeological deposits, can only be achieved through the destruction of the primary record.

- 83 The continuing development of archaeological techniques suggests that it will in future be possible to extract more data from excavation and intervention than is currently possible, just as it is now usual to extract much more information than was possible a few decades ago. This requires a cautious approach to the use of a finite resource, but cannot reasonably exclude any archaeological research at a significant place. We must recognise that much of the evidential value of the primary archive – the place itself – lies in its potential to increase our knowledge of the past, to help protect places by a better understanding of their significance, to stimulate research, to encourage the further development of techniques to extract it, and to train successive generations of archaeologists.
- 84 Intervention must be justified by considering the potential gain in knowledge in relation to the impact on the archaeological resource, and specifically on the place or type of site in question. Intervention should always be the minimum necessary to achieve the research objectives, but extensive enough to ensure that the full research potential of what is to be destroyed in the process can be realised.

## Restoration

- 85 **Restoration of a significant place should be acceptable if all the following criteria are met:**
- **the heritage value of what would be revealed or recovered decisively outweighs the value of what would be lost;**
  - **the work proposed is justified by compelling evidence of the previous form of the place, and is executed in accordance with that evidence;**
  - **the current state of the place, the form in which it survives, is not the result of an historically-significant event;**
  - **there would be no obvious incongruity, through creating something that has never previously existed as an entity;**
  - **resources are available to maintain what is restored.**
- 86 Restoration is intervention made with the deliberate intention of revealing or recovering some element of heritage value that has been eroded, obscured or previously removed, rather than simply maintaining the *status quo*. It may also achieve other conservation benefits, for example restoring a roof on a roofless building may make it both physically and economically sustainable in the long term.

**‘The heritage value of what would be revealed or recovered decisively outweighs the value of what would be lost.’**

- 87 Any restoration inevitably removes part of the record of past change to a significant place, and so reduces its evidential value, as well as potentially affecting its historical and aesthetic values. Restoration may, however, bring greater gains in revealing other values, such as the integrity and quality of an earlier and more important phase in the evolution of a place, which makes it significant. Where the significance of a place is the result of centuries of change, as in many medieval churches, restoration to some earlier stage in the evolution of the place is most unlikely to meet this criterion.

**‘The nature of the work proposed is justified by compelling evidence of the previous form of the place, and is executed in accordance with that evidence’.**

- 88 Evidence of the past form of the place should be drawn from all available sources – from study of the fabric of the place itself (the primary record of its evolution), any documentation of the original design and construction process, and subsequent archival sources, including documentation of past changes. The results of this research and the reasoned conclusions drawn from it should be clearly set out, and a copy deposited in an Historic Environment Record.
- 89 Speculative or generalised re-creation should not be presented as an authentic part of a place, but judgement is needed in determining the level of context-specific information required to justify restoration. For example, reinstatement of an historic garden requires compelling evidence of its planned layout and hard materials, usually based upon or verified by archaeological investigation, and the structure and species of its planting. Genetic continuity may be maintained by propagation from surviving plants, but it is neither essential, nor often possible, to replicate the precise location or shape of every plant once within the garden.

**‘The current state of the elements concerned is not the result of an historically-significant event’.**

- 90 If a building or structure was ruined as a consequence of an important historical event, its ruined state will contribute to its significance: for example, castles slighted in the Civil War, or monastic houses unroofed at the Dissolution. In the wake of such episodes, some places were cleared away completely, and others repaired and adapted for new purposes. Attempts to restore those (relatively few) places that have survived as ruins would deny their strong visual and emotional evidence of important historic events. Ruins – real or contrived – can also play a major role in designed landscapes, or be celebrated in art. Even so, their restoration or adaptive re-use may occasionally be justified if the alternative is loss.

91 By contrast, neglect and decay, abandonment, including the removal of roofs, accidental fires and similar circumstances are not normally historically significant events, and subsequent restoration of the damaged parts of the place, even after a long interval, will not fail this test. Retaining the resulting gutted shells as monuments is not likely, in most cases, to be an effective means of conserving surviving fabric, especially internal fabric never intended to withstand weathering; nor is this approach likely to be economically sustainable. In such cases, it is appropriate to restore to the extent that the evidence allows, and thereafter to apply the policy for new work.

92 Retaining ruins as memorials may not be the appropriate response to events like terrorist attacks, which may ultimately come to be seen as historically significant. The response – to rebuild, redevelop or memorialise – is often driven by public debate and may be regarded as part of the event.

**‘There would be no obvious incongruity, through creating something that has never previously existed as an entity’.**

93 An element of incongruity is inevitable in all restoration, not least in terms of the setting of the place concerned. Its effects are limited if relatively minor changes are reversed to restore a place to a form in which it previously existed as a complete entity. The substitution of timber sash windows for PVCu ones in the facade of an 18<sup>th</sup> century house, in order to return it to its known appearance a decade ago, rather than its conjectural appearance in the 18<sup>th</sup> century, is likely to be justifiable. But to restore only isolated parts of a place to an earlier form would create an entity that has never previously existed, which would lack integrity.

**‘Resources are available to maintain what is restored’.**

94 If a place or part of it was modified primarily in order to reduce maintenance costs, restoration without the long-term assurance of increased resources for maintenance is likely to be counter-productive. The reinstatement of elaborate parterres in historic gardens is an obvious example, but others can have more serious consequences. For example, reversing a ‘crown flat’ – a flat roof inserted between ridges to eliminate a valley gutter in an historic roof – will lead to rapid decay if the restored valley gutter is not adequately maintained.

## New work and alteration

<sup>7</sup> Vitruvius' statement, translated in 1624 by Henry Wotton in *The Elements of Architecture* as 'Well building hath three conditions: firmness, commodity, and delight' ('commodity' being used in its sense of fitness for purpose), remains as valid now as it was two millennia ago.

- 95 **New work or alteration to a significant place should be acceptable if all the following criteria are met:**
- there is sufficient information about the place fully to understand the impacts of the proposals on its significance;
  - the heritage values that would be affected have been identified, and their relative importance for the place understood;
  - those values would not be materially harmed and, where appropriate, would be reinforced or further revealed;
  - the interventions aspire to a quality of design and execution, related to their setting, which may be valued now and in the future;
  - the long-term consequences of the interventions can, from experience, be predicted as benign, or they are designed not unduly to prejudice other options in the future.
- 96 Most places now valued as part of the historic environment exist because of past patronage and investment. Most are maintained by private owners, and the work of successive generations often contributes to their significance. Adding that which may be valued in the future is vital to sustaining cultural values in the historic environment.
- 97 Owners and managers of significant places should not be discouraged from adding further layers of potential interest and value, provided that established heritage values are not compromised in the process.
- 98 New work often involves some interventions in the existing fabric of a place. A presumption in favour of preservation, even of evidential value, does not equate to, or justify a presumption against, any intervention in, or loss of, existing fabric. For example, making a comparatively small opening through a uniform medieval wall is not likely to reduce its evidential value, but simply adds another layer of evidence of its evolution. By contrast, the removal of a door or window, or evidence of some earlier aspect of the evolution of the wall, would reduce its evidential value.
- 99 There are limits, however, beyond which loss of inherited fabric compromises authenticity and integrity. A proposal to retain no more than the façade of an historic building attached to a modern structure must be considered in the light of an assessment of the heritage values of the building as a whole in its setting, as well as of its component parts, but will normally be unacceptable.

- 100 The greater the range and strength of heritage values attached to a place, the less opportunity there may be for dramatic change, but few significant places are so sensitive that they, or their setting, present no opportunities for enhancement. The need for quality in new work applies at every level, from small interventions in an historic room, to major new buildings or developments. Small changes need as much consideration as large ones, for cumulatively their effect can be comparable. Quality of design, materials, detailing and execution is obviously essential in places of established value; but places of little discernible significance offer the greatest opportunity for the creation of the heritage values of tomorrow. They have the greatest need of quality in what is added to them, but their potential will only be achieved if all new work aspires to the quality routinely expected in more sensitive places.
- 101 There are no simple rules for achieving quality of design in new work,<sup>7</sup> although a clear and coherent relationship of all the parts of the new work to the whole, as well as to the setting into which it is introduced, is essential. Choice of materials is particularly crucial to both durability and maintaining local distinctiveness.

## Reconciling conservation with other public interests

- 102 **Proposed changes which would materially harm the heritage values of a significant place should be unacceptable unless all the following criteria are met:**
- the changes are demonstrably necessary either to make the place economically sustainable, or to meet another public policy objective;
  - it is either not reasonably practicable to avoid the harm by achieving the conflicting objective in a different way, or the harm has been reduced to the minimum consistent with achieving that objective;
  - it has been demonstrated to the competent authority that the public benefit decisively outweighs the unavoidable harm to the values of the place, considering
    - its comparative significance,
    - the impact on that significance, and
    - the benefits to the place itself and/or the wider community or society as a whole.

- 103 Heritage values represent one public interest in places (Principle 1.4), but decisions about change may be influenced by a range of public and private interests. Tension between conservation and other public policies is best reconciled or balanced through dialogue based on mutual understanding and respect. Such tension usually arises from a perceived need to harm the heritage values of a place to achieve another public policy objective, or economically to sustain the place itself. The converse is 'enabling development' contrary to other public policy, which is proposed in order to sustain a significant place (paragraph 112). In both cases, it is important to keep a sense of proportion, and not automatically to assume that cultural or natural heritage values must prevail over all other public interests.
- 104 A willingness to compare the impacts on significance of a range of options to achieve the public objective is essential, as is selecting an option that either eliminates or (as far as is possible) mitigates harm. Mitigation should not be confused with compensation. Mitigation directly addresses the proposed harm to significance, for example archaeological excavation in accordance with the policy at paragraph 81 of deposits whose significance has been established, but which will be unavoidably destroyed. A high quality of design of interventions is not mitigation; it is essential in any significant place (Principle 4.6), regardless of any unavoidable harm.
- 'Comparative significance'**
- 105 The greater the significance of a place to society, the greater the weight that should be attached to sustaining that significance. This concept of 'proportionality' (Principle 5.4) is necessarily imprecise and relies on judgement rather than formulae.
- 106 Since statutory designation is a clear indicator of the significance of a place, the mere fact of designation can play a vital role in guiding options for strategic change; but the absence of designation does not necessarily mean that a place is of low significance (paragraph 51). The weight to be attached to heritage values relative to other public interests should not be considered until those heritage values have been properly evaluated, assessed against current criteria, and if they meet them, safeguarded by designation.

**‘Impact on significance’**

107 The assessment of the degree of harm to the significance of a place should consider the place both as a whole and in its parts, and the likely consequences of doing nothing. In the case of a derelict historic building, for example, should a viable, but modestly damaging, proposal be refused in the hope that a better or less damaging scheme will come forward before the place reaches the point of no return? In such circumstances, the known or predicted rate of deterioration is a crucial factor.

<sup>8</sup> This is currently stated as government policy in PPG 15, *Planning and the historic environment* (1994) at paragraph 3.19 (iii)

**‘Benefits to the place’**

108 Quite minor changes – for example, to meet the duties imposed by the Disability Discrimination Act – may keep a place fit for use. This in turn can make it sustainable by giving it market value, or allowing its continued use by a community. Such changes which cause harm to the heritage values of a place should obviously be limited to the extent necessary to sustain it in use, and their impacts mitigated so far as possible. Offers of compensation – non-essential benefits to other aspects of the place, or to other heritage interests – should not make harmful proposals more acceptable.

109 While conservation of the historic environment is a key aspect of national policy, there are few fiscal concessions to support it and financial assistance for private owners is limited. Very few places can be maintained at either public or private expense unless in beneficial use, which normally requires continuing adaptation and change.

<sup>9</sup> The established English Heritage policy on enabling development has here been restated in the terminology and format of other policies in this consultation draft. However, unless or until any such restatement is formally adopted by English Heritage, its policy on enabling development remains as stated in *Enabling Development and the Conservation of Heritage Assets* (EH 2001).

**‘Benefits to the wider community or society as a whole’**

110 These assessments are broader and more complex than those regarding the gains and losses affecting the heritage values of a place. The underlying considerations should always be proportionality and reasonableness: whether, in relation to the place or society, the benefits of change outweigh the residual, unavoidable harm that would be done to the significance of the place. The balance lies between significance – the range of heritage values ascribed at the point of change to something which, if lost, cannot be replaced – and predicted and potentially short-term future benefits.

- 111 Balancing conservation and other public objectives can be most difficult when the values of a significant place, often an archaeological site or an historic building, must be compared with the potential of a replacement to enhance its context because of its potentially greater cultural value. Subjective claims about the architectural merits of replacement buildings cannot justify the demolition of statutorily-protected buildings.<sup>8</sup> There are less clear-cut situations, however, in which it is proposed to replace a building or develop a place of modest, but positive, heritage value in its context with one that is claimed to be of much greater architectural quality, or where such a proposal would affect the setting of a significant place. Its supporters claim net enhancement, while its opponents claim absolute harm to the heritage values of the place. Each is making a value judgement, but choosing to attach different weights to particular values. If such positions are maintained, the choice is ultimately a political one, or for an impartial planning inspector:

## Enabling development

- 112 **Enabling development to secure the future of a significant place should be unacceptable unless the following criteria are met:**<sup>9</sup>
- the enabling development will not materially harm the heritage values of the place or its setting;
  - the enabling development also meets all the following criteria:
    - it avoids detrimental fragmentation of management of the place;
    - it will secure the long term future of the place, and where applicable, its continued use for a sympathetic purpose;
    - it will meet the cost of resolving problems arising from the inherent needs of the place, rather than the circumstances of the present owner, or the purchase price paid;
    - sufficient financial assistance is not available from any other source;
    - it is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the place;
    - its form minimises harm to other public interests, particularly conflict with other planning policies;
  - the public benefit of such enabling development decisively outweighs the disbenefits of breaching other public policies.

# CONCLUSION

## USING THE PRINCIPLES

These *Conservation Principles, Policies and Guidance* introduce a values-based approach, intended to help decision-makers to take account of the diverse ways in which people value the historic environment as part of their cultural and natural heritage.

Justifiable decisions about change in the historic environment depend upon understanding who values a place and why they do so, leading to a clear statement of its significance and with it the ability to understand the impact of change on that significance.

Every reasonable effort should be made to eliminate or minimise adverse impacts on significant places. Ultimately, however, it may be necessary to balance the public benefit of the proposed change against the harm to the place. If so, the weight given to heritage values should be proportionate to the significance of the place and the impact of the change upon it.

While the historic environment is constantly changing, each significant part of it represents a finite resource. If it is not sustained, not only are its heritage values eroded or lost, but so is its potential to give distinctiveness, meaning and quality to the places in which people live, and provide people with a sense of continuity and a source of identity. The historic environment is a social and economic asset and a cultural resource for learning and enjoyment.

While developed primarily to guide the activities of English Heritage staff, we therefore commend these *Principles, Policies and Guidance* for adoption and application by all involved in managing the historic environment and making decisions about its future.

# DEFINITIONS

Definitions of words used in a specific or technical sense. The *Oxford English Dictionary* definition otherwise applies.

**Authenticity**

Those characteristics that most truthfully reflect and embody the cultural heritage values of a place<sup>10</sup>

**Conservation**

The process of managing change in ways that will best sustain the heritage values of a significant place in its setting, while recognising opportunities to reveal or reinforce those values for present and future generations

**Conservation area**

'An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance', designated under what is now s69 of the Planning (Listed Buildings and Conservation Areas) Act 1990

**Context**

Any relationship between a place and other places, relevant to the values of that place

**Designation**

The recognition of the heritage value(s) of a place by giving it formal status under law or policy intended to sustain those values

**Heritage**

All inherited resources which people value for reasons beyond mere utility

Heritage, cultural

Inherited assets which people identify and value as a reflection and expression of their evolving knowledge, beliefs and traditions, and of their understanding of the beliefs and traditions of others

Heritage, natural

Inherited habitats, species, ecosystems, geology and landforms, including those in and under water; to which people ascribe value

**Historic environment**

All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible or buried, and deliberately planted or managed flora

**Integrity**

Wholeness, honesty

**Material**

Relevant to and having a perceptible effect on

**Natural change**

Change which takes place in the historic environment without human intervention, which may require specific management responses (particularly maintenance or periodic renewal) in order to sustain the significance of a place

<sup>10</sup> This definition is based on *The Nara Document on Authenticity* (ICOMOS 1994)

**Object**

Anything not (now) fixed to or incorporated within the structure of a place, but historically associated with it

**Place**

Any part of the historic environment, of any scale, that has a distinctive identity perceived by people

**Preserve**

To keep safe from harm<sup>11</sup>

**Repair**

Work beyond the scope of maintenance, to remedy defects caused by decay, damage or use, but not involving restoration

**Restoration**

To return a place to a known earlier state, without conjecture

**Reversibility**

Capable of being reversed so that the previous state is restored

**Transparent**

Open to public scrutiny

**Setting**

The surroundings in which a place is experienced, embracing an understanding of perceptible evidence of the past in the present landscape

**Significance**

The sum of the cultural and natural heritage values of a place, often set out in a statement of significance

**Sustain**

To maintain, nurture and affirm validity

**Sustainable**

Capable of meeting present needs without compromising ability to meet future needs

**Value**

An aspect of worth or importance, here ascribed by people to qualities of places

Value, aesthetic

Relating to the ways in which people derive sensory and intellectual stimulation from a place

Value, communal

Relating to the meanings of a place for the people who relate to it, and whose collective experience or memory it holds

Value, evidential

Relating to the potential of a place to yield primary evidence about past human activity

Value, historical

Relating to the ways in which the present can be connected through a place to past people, events and aspects of life

**Value judgement**

An assessment that reflects the values of the person or group making the assessment

<sup>11</sup> The legal interpretation established in South Lakeland DC v Secretary of State, for the Environment and Rowbotham (1991) JPL 440

# OUR QUESTIONS

**Question 1:** Many responses to our initial consultation addressed the issue of the balance between public and private interests, particularly in designated places. Does Principle 1.4, and the commentary at, particularly, paragraphs 96-7 and 109, strike an equitable, appropriate balance?

**Question 2:** Is our suggested 'family' of heritage values appropriate? If not, how should it be expanded or modified?

**Question 3:** In paragraphs 33-54, have we set out clearly the steps necessary to understand the values of a place and its significance? If not, what should be amended, or further explained?

**Question 4:** There are many definitions of conservation. We suggest, in Principle 4.2, that it includes recognising opportunities to reveal or reinforce the values of a place. Some insist that all deliberate change tends to be harmful, thus conservation demands limiting change to the minimum necessary to avoid loss of the place. Others have suggested that 'reinforce' be replaced by 'enhance', reflecting current legislation related to conservation areas, and that we should be seeking to create, rather than merely recognise, opportunities to reinforce or enhance. Have we got the balance right?

**Question 5:** Do you agree that the continuation or reinstatement of appropriate routine management and maintenance is the foundation of conservation (paragraph 67)? If not, what correction, qualification or further guidance is necessary?

**Question 6:** Do you agree that periodic renewal intended or inherent in the original design of a significant place is normally appropriate (paragraph 71)? If not, what correction, qualification or further guidance is necessary?

**Question 7:** Do you agree that repair and adaptation intended to sustain the heritage values of a significant place is acceptable if all the criteria set out in paragraph 74 are met? If not, what correction, qualification or further guidance is necessary?

**Question 8:** Do you agree that intervention in significant places primarily to increase knowledge of the past should not involve material loss of their evidential value unless all the criteria set out in paragraph 81 are met? If not, what correction, qualification or further guidance is necessary?

**Question 9:** Do you agree that restoration should be acceptable if all the criteria set out in paragraph 85 are met? What correction, qualification or further guidance is necessary?

**Question 10:** Do you agree that new work and alteration should be acceptable if all the criteria set out in paragraph 95 are met? If not, what correction, qualification or further guidance is necessary?

**Question 11:** Do you agree that proposed changes which would materially harm the heritage values of a place should be unacceptable unless the criteria set out in paragraph 102 are met? If not, what correction, qualification or further guidance is necessary?

**Question 12:** Do you agree that enabling development should be unacceptable unless it meets all of the criteria originally established by English Heritage in 1999 and restated here in paragraph 112? If not, what correction, qualification or further guidance is necessary?

**Finally, there are two over-arching questions that we would like to ask you**

**Question 13:** Are there any key issues that should be addressed as *Policies and Guidance* that are not included in the consultation draft?

**Question 14:** Should the final version of the *Principles, Policies and Guidance* have illustrated examples, or are these better reserved for subsequent, more detailed guidance on specific applications of the *Principles, Policies and Guidance*?

# HOW TO RESPOND

## RESPONSES

Consultees are invited to consider the *Conservation Principles, Policies and Guidance* and respond to the consultation questions listed on page 63. Please identify clearly the question number(s) to which you are responding. We welcome any other comments on the *Conservation Principles, Policies and Guidance*.

Your responses should be sent to Sally Embree by 11 May 2007.  
Email address: [conservationprinciples@english-heritage.org.uk](mailto:conservationprinciples@english-heritage.org.uk)

Or by post to:  
Conservation Principles  
Conservation Department  
English Heritage  
1 Waterhouse Square  
138-142 Holborn  
London  
EC1N 2ST

A copy of the consultation document and details of how to respond can also be found at the English Heritage website at: [www.english-heritage.org.uk/conservationprinciples](http://www.english-heritage.org.uk/conservationprinciples)

We aim to acknowledge receipt of all responses. If you do not receive an acknowledgment within 15 working days, please call us on 020 7973 3265 to check that your contribution has been received.

All information in responses, including personal information, may be subject to publication or disclosure under the Freedom of Information Act 2000. If a correspondent requests confidentiality, this cannot be guaranteed and will only be possible if considered appropriate under the legislation. Any such request should explain why confidentiality is necessary. Any automatic confidentiality disclaimer generated by your IT system will not be considered as such a request unless you specifically include a request, with an explanation, in the main text of your response.

## CODE OF PRACTICE ON CONSULTATION

This consultation takes place in accordance with the Government's Code of Practice on Consultation. The Code sets out six criteria for any government consultation.

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
3. Ensure that your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process influenced the policy.
5. Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

The full consultation code may be viewed at [www.cabinet-office.gov.uk/regulation/consultation/code/](http://www.cabinet-office.gov.uk/regulation/consultation/code/)

Are you satisfied that this consultation has followed these criteria? If not, or you have any other observations about ways of improving the consultation process please contact:

Duncan McCallum  
Consultation Co-ordinator  
English Heritage  
1 Waterhouse Square  
138-142 Holborn  
London  
EC1N 2ST

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