

CONSERVATION PRINCIPLES FOR THE SUSTAINABLE MANAGEMENT OF THE HISTORIC ENVIRONMENT, HISTORIC ENGLAND: DRAFT GUIDANCE CONSULTATION RESPONSE

- 1.1 Barton Willmore welcomes the opportunity to comment on the draft 'Conservation Principles for the Sustainable Management of the Historic Environment' published in November 2017 for consultation. This is a timely revision of the 2008 version 'Conservation Principles Policies and Guidance for the Sustainable Management of the Historic Environment' and usefully seeks to offer guidance for decisions affecting the management of the nation's tangible heritage. Planning legislation and policy requirements places heritage considerations at the forefront of many development and regeneration projects. We welcome steps that can be taken to bring clarity and consistency to decision-making together with robust guidance to safeguard heritage assets through the development management process.
- 1.2 We would like to take this opportunity to make a number of observations on the draft document. The headings below follow those used in the document.

Introduction

- 1.3 The alignment of Conservation Principles guidance with the heritage interests led approach set out in the National Planning Policy Framework (NPPF) is a positive step. For the first time it offers guidance on the meaning of the heritage interests that are identified but not defined in the NPPF (except for archaeological interest). This in turn should give greater clarity to the heritage assessment process for all parties, which is welcomed.
- 1.4 Whilst we recognise that there will be a legacy in the values-led approach (evidential, architectural, aesthetic and historic) advocated in the 2008 Conservation Principles, in the interests of consistency it would be helpful if the guidance made a general commitment on behalf of its users to adopt the heritage interests. Whilst the interests and values do cover the same ground, they have different nuances which can lead to confusion. The value of an agreed set of defined terms lies in facilitating a common understanding of, and methodology for, appraising heritage significance, which in turn should better facilitate decision-making and transparency.

- 1.5 The draft document refers to both values and interests throughout, which contributes to this confusion.

Chapter 1: Historic England's Conservation Principles

Principle 1: The historic environment is of value to us all.

- 1.6 We support the sentiment of Principle 1, and agree that market pressures and development economics form part of the challenge in sustainably managing heritage assets (para 8). However, this excludes other issues and pressures that can similarly be challenging to reconcile when managing heritage assets, for example the physical impacts of climate change. As drafted, it therefore would appear to offer only a narrow focus for justifying the public interest in protecting our heritage.

Principle 4: Heritage assets should be managed to sustain their heritage values

- 1.7 We note that paragraph 4.4 from the 2008 version has been removed. This set out a principle that action to counter harmful effects of natural changes, or to minimise the risk of disaster, should be timely, proportionate to the severity and likelihood of identified consequences, and sustainable. As we move forward into a period where tackling climate change will become increasingly relevant to the sustainable management of the historic environment, it would seem a retrograde step for such an objective to be omitted.

Chapter 2: Understanding Significance

- 1.8 We endorse the interests as opposed to values approach to understanding heritage significance and generally support the definitions provided. Little of the guidance on the methodology for assessing heritage significance set out in in the 2008 document however has been carried forward. Whilst we consider there is scope for this to be simplified, it does nevertheless provide a useful framework for how to go about appraising heritage significance. It establishes a series of key steps and principles that we consider to be of particular value, including understanding the relative significance of component parts and phases, and the contribution made by setting and context which seems to be largely missing from this document.
- 1.9 We offer the following observations:

- Para 25: We note the use of the term 'instrumental benefits'. We suggest it would be more helpful for decision-makers if these were tied back to the 'public benefits' defined in the NPPF and Planning Practice Guidance (PPG).
- Para 38: Further guidance on understanding archaeological interest would be helpful. Taken to the extreme, all heritage assets have potential to hold evidence of past human activity by their very nature as heritage assets. The NPPF definition makes clear that those assets with archaeological potential are those where they are the primary source of evidence for the past people, cultures or events that made it worthy of expert investigation. The commentary in paragraphs 38-41, by contrast, makes no reference to 'expert' investigation and states that assets with archaeological interest 'may' be the only source of evidence for human activities in the distant past. The definition of evidential value in the 2008 version is helpful in guiding that age is a strong indicator of relative evidential value, as is the degree of survival. Such guidance has been omitted from the revised version. We suggest that further guidance on the threshold for where simply surviving historic fabric becomes fabric of archaeological interest would be helpful.
- Para 43: The 'sublime' landscape of the Lake District is given as an example of how we can draw sensory and intellectual stimulation from a place. We seek clarification on whether the revised document is broadening the scope of heritage assets to include natural (i.e. non-designed) landscapes.

Chapter 3: Applying the Principles

- 1.10 Whilst we support much of the approach outlined in this section, it has been considerably generalised from the more detailed and nuanced guidance set out in the 2008 document chapters 'Managing Change to Significant Places' and 'Conservation Policies and Guidance'. Whilst these sections could usefully be reviewed, their omission is to the detriment of the revised document. The purpose of the document stated in the Introduction is to guide Historic England's advice and decisions affecting the conservation of heritage assets. Our experience of the value of the 2008 document lies in establishing a clear decision-making framework that decision-makers, heritage practitioners, owners etc can work through to consider the appropriateness of different approaches in different scenarios. The revised document offers much more generalised advice that repeats much of the guidance already issued in the PPG and other Historic England guidance documents. Whilst it sets out admirable objectives, it offers little by way of detailed guidance that would aid in delivering these, which in turn has repercussions for the usefulness of this document specifically in managing change.

1.11 We offer the following further comments:

- Para 53: Whilst we very much support the principle that undesignated buildings, designed landscapes etc can hold heritage significance, there is a clear and necessary distinction in planning policy terms between designated and non-designated heritage assets, and historic places, structures etc that hold no heritage designation. It is not clear how para. 53 fits within the existing national policy context.
- Para 62: We welcome clarity that change can be neutral or beneficial, as well as harmful.
- Para 63: We are pleased to see it recognised that the continual adaptation of assets can make a positive contribution where such interventions are of high quality and do not erode the current significance.