



THE INSTITUTE OF CONSERVATION

## Historic England Conservation Principles for the Sustainable Management of the Historic Environment:

### Icon Response

02 February 2018

Icon, The Institute of Conservation, welcomes the opportunity to respond to [Historic England's consultation](#) on Conservation Principles for the Sustainable Management of the Historic Environment.

Icon is a membership organisation and charity which brings together those with a passion for the care of cultural heritage. Icon raises awareness of the cultural, social and economic value of caring for heritage and champions high standards of conservation. We represent nearly 3,000 individuals and organizations comprising professional conservators, heritage scientists and many others committed to improving understanding of and access to our cultural heritage.

We have responded to the questions that we consider relevant to our sector and membership. We would like to thank Icon member Dr David Leigh for his valuable contribution to our response.

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#### 1. Are you responding to this consultation on behalf of an organisation?

Yes

No

If 'yes' please give the name of your organisation

Icon (Institute of Conservation)

#### 2. What area of heritage management does your work represent?

Historic/Heritage Property Owner or Manager

Local Government Heritage Advisor

Professional Organisation/Institute

Amenity Society, Charity or other Non-Government Heritage Organisation

Government Department or Non-Departmental Government Organisation

Private Sector Heritage Management Planning Advisor/Consultancy

Development Industry Representation

Academic Research and Education

Museum and Archives Curation

Member of the Public

Other (please specify)

**3. If you have used the previous (2008) edition of Conservation Principles, is the draft document more or less clear to understand and use?**

- A lot clearer
- A bit clearer
- Similar
- Less clear
- A lot less clear
- Not sure

**4. Please provide any comments on the draft document's Introduction below (text box will expand to accept your comments)**

Icon welcomes the opportunity to comment on Historic England's revision of the Conservation Principles for Sustainable Management of the Historic Environment.

The document's placement of the significance of heritage assets at the heart of the decision-making process is commendable, as is the clarification that the principles apply to *all* heritage assets, whether designated or not. We applaud the importance that the draft places on achieving a thoughtful and well-researched understanding of issues before decisions or interventions are made. The document's brevity will undoubtedly contribute to its accessibility. However, its predecessor – the 2008 edition of Conservation Principles – while longer in length, contains valuable material. We consequently recommend that this document also remains accessible.

In reference to the draft's introduction, we would like to raise the following concerns and make the following suggestions for improvement.

**Main points:**

Paragraph 6, Heritage Asset: The document focusses almost exclusively on fixed heritage, in particular through its definition of a "heritage asset." Portable objects may not at first appear relevant to document's focus on the "management of the historic environment." However, many heritage buildings derive their significance from their contents, whether they are museums, galleries, historic houses, cathedrals or churches. Similarly, heritage buildings, sites, landscapes and gardens may derive their significance from outdoor sculptures. The significance of such heritage assets cannot be assessed without simultaneously assessing the contribution that their contents and associated objects make to this significance. Accordingly, we urge for the definition of a heritage asset to include reference to objects. The document's only mention of "associated objects" in paragraph 15 does not give sufficient weight to this aspect of a heritage asset's significance.

Paragraph 6, Historic Environment: The definition of the historic environment references the underwater and/or undersea part of the historic environment through the use of the term "submerged." This is later referred to as "submerged remains" in paragraph 38. Underwater heritage remains a vital part of Historic England's responsibilities (as evidenced through its logo). It should consequently be clarified in the definitions whether these conservation principles embrace those aspects of the historic environment which are not land-based. The term "submerged" does not capture the full meaning of underwater or undersea remains.

**Detailed points:**

Paragraph 2, lines 2-3: We recommend changing "It does" to "They do..."

Paragraph 3, 4<sup>th</sup> bullet point: We believe British Standard EN 15898:2011 Conservation of Cultural Property Main General Terms and Definitions is consistent with the Principles and recommend adding it to the list.

Paragraph 6, Significance: "The value" should be "The values," as significance is the combination of values.

**5. Please provide any comments on Section 1: Historic England's Conservation Principles below (text box will expand to accept your comments)**

**Main points:**

Paragraph 15, 3<sup>rd</sup> bullet point: We recommend expanding "Whether associated objects and historical records contribute to its interest" with examples, such as historic houses or churches. Further, we urge for "whether" to be changed to "how," as the significance of such heritage assets cannot be assessed without assessing the contribution that their contents make (see point made on Paragraph 6, Heritage Asset)

**Detailed points:**

Paragraph 11, line 2: We recommend deleting the word "established" as heritage interests may not have yet been established until the moment of expert evaluation; and the term "established" in this context is ambiguous.

Paragraph 15, lines 1-2: We find the phrase "so far as that is possible at a point in time" troublesome. This could be used as an opt-out, as it could lead to claims that it is not possible to identify full significance.

Paragraph 15, 4<sup>th</sup> and 5<sup>th</sup> bullet points: We consider these more relevant to the decision-making stage following the establishment of full significance. We recommend moving them to the subsequent process, for example under paragraph 65.

Paragraph 17, 4<sup>th</sup> bullet point: Authenticity is one factor among many which contributes to an asset's significance. We recommend replacing "authenticity" with "significance" in the phrase "minimum loss of its authenticity as a source for future generations." Authenticity could be cited as an example among several factors, e.g. integrity and condition.

Paragraph 19, line 2: "the decision" should be "the decisions" to remain consistent with the rest of the paragraph.

Paragraph 23, lines 8-9: We recommend adding "and public advocacy" to "relevant archives and records" as it is not enough to make records available, the public must also be made aware of them.

Paragraph 23, line 10: We recommend clarifying "proportionate record-making." It could be changed to "record-making proportionate to the asset's significance."

**6. Please provide any comments on Section 2: Understanding Significance below (text box will expand to accept your comments)**

**Main points:**

We understand the reasoning for aligning the four categories of significance to the NPPF framework and believe that consistency can improve accessibility and ease of use. However, we would like to raise the following concerns around the chosen categories (Historic, Architectural, Archaeological

and Artistic). We consider the former categories (Evidential, Historical, Aesthetic and Communal) more inclusive in defining significance.

Paragraphs 28-37: The frequent explicit and implicit references to communal value under the category “historic interest” suggests the need to include “communal” as an interest in itself. Communal value is not always historic.

Paragraphs 38-41: The term “archaeological” is less comprehensive than “evidential.” The latter includes evidence of intangibles, such as the knowledge of building materials or uses of space. According to paragraph 38, “archaeological interest is sometimes called evidential or research value.” Yet architectural and artistic interests are also frequently evidential. Further, industrial heritage and scientific heritage lack a natural home, with the loss of the term “evidential.”

Paragraphs 42-49: As architectural and artistic interest are said to “derive from a contemporary appreciation of the asset’s aesthetics,” we believe the two interests could be joined together in the former “aesthetic” category. The double emphasis on aesthetic considerations through the “architectural” and “artistic” interests seems arbitrary and risks side-lining the other categories.

Paragraph 46, line 5: We are concerned by the fact that this is the only reference to industrial heritage in the document. We would welcome more recognition of this type of heritage as well as the evidence of science and its history.

#### **Detailed points:**

Paragraph 26, lines 1-2: We recommend changing “value” and “interest” to “values” and “interests” to reflect the many potential values and interests of a heritage asset.

Paragraph 30, line 8: We are concerned that the phrase “an asset’s ability to illustrate can usually sustain faithful replacement of features” provides too much latitude for intervention. We consequently recommend changing this to “*can* sometimes sustain.”

Paragraph 36, line 3: We recommend adding “technological or scientific interest” to “An asset that is principally valued for its architectural or artistic interest” to correspond with the preceding sentence’s reference to science.

#### **7. Please provide any comments on Section 3: Applying the Conservation Principles below (text box will expand to accept your comments)**

Paragraph 54: We recommend making reference to international designations such as UNESCO World Heritage status and Outstanding Universal Values.

#### **8. Please provide any comments on the Glossary and Further Information sections below (text box will expand to accept your comments)**

NA

#### **9. Please provide any additional comments you have regarding the draft document below (text box will expand to accept your comments)**

Subtitle of Document: Although “Sustainable Management” is within the subtitle of the document, there is little discussion of sustainability in the body of the text, in contrast to the 2008 edition of the Principles (p.46). We recommend that the use of energy-efficient processes and materials, the positive energy qualities of traditional materials, the re-use of old materials and the impact of energy-efficiency measures on significance is considered in the updated document. These are relevant to the successful application of the conservation principles.

The words “significance” and “value” are sometimes used interchangeably in the document. We recommend consistent use of the terms, for example in accordance with definitions in BS EN 15898.