

# THE VICTORIAN SOCIETY

The national charity campaigning for the Victorian and Edwardian historic environment

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Dear Kaye Moxon

## ***Conservation Principles, Policies and Guidance* consultation**

Thank you for inviting the Victorian Society to comment on this document.

We welcome the fact that Cadw's document is shorter than its English Heritage model. However, we regret the fact that two apparently very similar documents are to be used either side of the border, while the differences between them are not very clear and the 'particular needs of Wales' referred to on page 4 of the introduction are not explained. There is great scope for confusion, especially if one tries to understand what is really meant by a close examination of the differences.

Why was it felt necessary to re-order the principles from the English document? English principle 1 becomes Welsh principle 3, 2 becomes 4, 3 becomes 2, 4 becomes 1, 5 and 6 stay in the same position. What are we to make of this re-ordering? Is there a hierarchy of principles, or do all have equal weight?

Confusingly, there are subtle changes in the wording between the two sets of principles. In England, 'Significant places *should* be managed to sustain their values', while in Wales 'Significant places *will* be managed to sustain their values'; the latter sounds more like an aspiration than a policy. Similarly Welsh Principle 4 also adopts 'will' rather than 'should'. But is this really what is meant?

Likewise, the reason for changes to the numbered paragraphs beneath each of the six principles is not always clear. We did not like the language of English Heritage's document, but often the improvement in clarity is marginal at best and sometimes the meaning of the original sentences has been altered, seemingly unintentionally.

For example, in Principle 1.4: 'Conservation is the careful management of change.' Quite simply, no, it is not when so starkly put. The original text continued in the same sentence 'in ways that will best sustain [a place's] heritage values', and surely this should be retained.

Another example, in Principle 2.1: here the meaning of the term 'place' has been changed. In England, 'Any *fixed* part of the historic environment with a distinctive identity *perceived* by people can be considered a place. (EH Principle 3.1). In Wales, a place does not have to be fixed: 'Any part of the historic environment *to which people have given a distinctive identity* is considered here to be a place.' But the 'distinctive identity' has to be *given* by people in Wales, whereas in England they only have to *perceive* it. What is meant by this difference? Looking to the section on *Definitions* does not help, as Cadw's document repeats the English Heritage definition and makes the same error of omitting the word 'fixed' – which seems to be the essential quality distinguishing *places* and *objects*. Whatever is meant, the differences between the definition given in 2.1 and the *Definitions* section need to be resolved.

### **Assessing heritage significance**

In Principle 2.2, the wording has been changed from English Heritage Principle 3.2, with no gain in clarity. The original statement that significance embraces all the cultural and natural heritage values now seems to be written so that significance may consist of *either* these values *or* people's emotional responses to a place. Is this intentional? The mention of 'strong emotional responses' in 2.4 seems to suggest that it is, rather than being a simple problem of drafting. One wonders whether this is taking the definition of significance too far, so making it fundamentally unknowable, or at least quite a challenge for the owners who in Principle 3.6 are required to understand the significance of their historic places. Emotion plays a considerably smaller role in the English document, where it occurs quite properly in the context of commemorative and symbolic values.

The reasons why Cadw should adopt a different approach to assessing significance from English Heritage are not clear, and it would help to have them spelled out. Certainly the English text is easier to follow, and the understanding of significance as relating to the values associated with places rather than the emotions generated by them is more consistent with current practice. So far as I recall the Burra Charter does not mention emotions at all.

Moreover, the three step approach to assessing significance outlined in 2.3 to 2.5 seems fundamentally flawed. If I understand the document correctly, then the first stage of assessing significance is considered to be the investigation of the fabric, the second stage is understanding the 'strong emotional response[s] from people who know it' as well as '*how they might respond to change*' in its form or appearance; the third stage is understanding how people '*might respond to a change in function*' of a place. This is quite wrong. A statement of significance should be able to be written for a place even when no changes are proposed, and should relate to values people attribute to it in its present state. How people might respond emotionally to changes in its form or function is quite another thing, to be considered as part of studying a place's issues and vulnerabilities perhaps, but this does not contribute to its significance.

### **Relationship to government policy and to English Heritage's *Conservation Principles***

We pointed out to English Heritage that we had had little engagement in the formulation of their *Conservation Principles*, and felt no sense of ownership of their document. Our experience is that there is little interest in this document outside English Heritage, and we have not found that it makes their casework decisions any more transparent or understandable.

The draft responses to the PPS 15 Consultation I have seen express strong reservations about English Heritage's *Conservation Principles*, and it is clear that many in the historic environment sector feel uncomfortable about the way 'significance' is defined in it. Moreover, EH's *Conservation Principles* is out of step with the language of the draft PPS 15, so it will inevitably have to be revised to take into account of whatever happens with the PPS and the long promised but now barely expected Heritage Protection Bill. At the moment, the language of significance has no basis in legislation.

As it stands Cadw's draft *Conservation Principles* is a puzzling adaptation of English Heritage's, with no rationale given for the differences. And English Heritage's document itself will have to change in response to the PPS. That would then place the Welsh version two steps removed from its model, no doubt adding further confusion without any benefit. It does not seem an appropriate time for Cadw to be pushing forward with its own document. If Cadw is determined to follow the English Heritage model, it would be better to wait until English Heritage has got its own document sorted out.

Yours sincerely

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Director