

THE ARCHAEOLOGY FORUM

a grouping of independent bodies concerned with archaeology

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Conservation Principles, Policies and Guidance
c/o Kaye Moxon
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Dear Ms. Moxon,

CONSERVATION PRINCIPLES, POLICIES AND GUIDANCE FOR THE SUSTAINABLE MANAGEMENT OF THE HISTORIC ENVIRONMENT IN WALES

Introduction

The Archaeology Forum is a grouping of the key, non-governmental organisations concerned with archaeology in the UK. Its members include the Association of Local Government Archaeological Officers UK, the Council for British Archaeology, the Institute of Conservation, the Institute for Archaeologists, the National Trust, Rescue, the Society of Antiquaries of London, the Federation of Archaeological Managers and Employers (formerly SCAUM), and the Society of Museum Archaeologists UK.

The Forum has close links with Wales: it meets regularly in the Principality and its constituent organisations provide representatives who practise and have considerable experience of archaeology and the historic environment in Wales.

The Forum is pleased to have the opportunity to contribute to the formulation of *Conservation Principles, Policies and Guidance for the sustainable management of the historic environment in Wales*.

General

The Forum welcomes the publication of draft *Conservation Principles, Policies and Guidance* for Wales which in large part achieves its objective of providing a clear and logical approach for decision-making in relation to the historic environment (for instance, in its identification of the public interest in the heritage value of places, the importance of public participation and the clear exposition of principle at paragraphs 6.3 to 6.6 of Principle 6)

In particular, the Forum supports in principle the approach of building upon English Heritage's *Conservation Principles* (with its emphasis upon identifying, understanding and preserving the 'significance' of heritage assets) adapting those principles for use in Wales in part by the adoption of a common terminology focusing upon 'significant places'. However, the Forum suggests that, as a document intended to have weight in the plan- and decision-making process, it would benefit from greater explanation of the relationship between 'significance' and current legislative terminology such as 'national importance' and 'special interest'.

The Forum also welcomes the recognition of, and support for, undesignated places as well as those that '*meet particular thresholds of significance necessary for formal international, national or local designation*' (Introduction, p.5).

Specific Response to Consultation Questions

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

The *Conservation Principles* are laid out clearly, but would benefit from further elaboration and explanation, whether in this document or in supporting guidance (as indicated below).

The first sentence of paragraph 1.6 of the *Conservation Principles* (p.8) appears to contain a typographical error. It should possibly read '*New work must respect the setting ~~of a~~ and significance of the place*' or '*New work must respect the setting of a significant ~~tee~~ of the place*'? This aspect may need close attention in view of emerging definitions and interpretations of setting in relation to the European Landscape Convention and in the Planning Policy Statement in England.

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

The need to apply recognized and consistent standards in the historic environment is a key issue that is not clearly identified in the principles.

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

Yes, provided that further elaboration is provided elsewhere. Cadw's approach is sufficient as a matter of principle, but the greater detail provided by English Heritage is useful and consideration should be given to the provision of more comprehensive guidance in supporting documentation.

4. In this draft we have chosen not to have a section on 'Understanding Heritage Values' and 'Assessing Heritage Significance', which appears in English Heritage's *Conservation Principles*. Are the explanatory paragraphs under Principle 2 sufficient to enable you to describe the significance of a place, or do you require additional guidance? Would it be helpful to have an additional explanation in this document, or have a worked example available on Cadw's website?

The Forum believes that additional and detailed guidance is required to support robust policy making and effective planning decisions that may need to withstand challenges through the planning process. (see the answer to question 3 above). The additional explanation should appear either in expanded *Conservation Principles, Policies and Guidance* or further supporting documentation rather than solely on Cadw's website.

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

Yes.

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

The policies and guidance (for instance, in relation to 'archaeological intervention') should refer to the need for work to be carried out to recognized standards by professionally recognized organisations or archaeologists (cf. paragraph 13 of Welsh Office Circular 60/96).

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

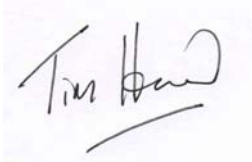
Such studies should be disseminated by a range of media including websites and hard copy. Members of the Forum are well placed and would be happy to contribute to the production of such case studies.

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

This is a matter for each of the constituent members of the Forum to consider and implement according to its own circumstances.

Thank you for the opportunity to contribute to this consultation. The Archaeology Forum would be happy to contribute further to the formulation of principles, policy and guidance.

Yours sincerely,

A handwritten signature in black ink that reads "Tim Howard". The signature is written in a cursive style with a horizontal line underneath the name.

Tim Howard LLB (Hons), Dip Prof Arch
IfA on behalf of the Archaeology Forum

The Archaeology Forum's members are:

The Association of Local Government Archaeological Officers UK
The Council for British Archaeology
The Institute of Conservation
The Institute of Field Archaeologists
The National Trust
The National Trust for Scotland

Rescue: the British Archaeological Trust
The Society of Antiquaries of London
The Society of Antiquaries of Scotland
The Federation of Archaeological Managers and Employers
The Society of Museum Archaeologist