



ACT Heritage Council

CONSERVATION MANAGEMENT PLANS Guiding Principles

Revised 10 Feb 2015

INTRODUCTION

A Conservation Management Plan (CMP) is an important document to help owners, managers and the ACT Heritage Council understand the heritage values of a place in detail, and how those values can be best conserved given the particular management context of the place. It helps to manage change, and is a widely used tool.

A conservation management plan, also known as a conservation plan, has been defined as “a document which sets out what is significant about a place and consequently what policies are appropriate which enable that significance to be retained in its future use and development. For most places it deals with the management of change”.

(Kerr 2000, p.1)

A CMP explains why a place is considered to be significant. It then investigates the constraints and opportunities that arise or impact on the place. These, with the detailed understanding of the significance of the place, are then used to develop policies to guide the conservation of the place in the real-world management context. Policies can cover a range of matters such as changes, future use (including adaptive reuse), development, management and maintenance.

The plan should address the principles laid down in the *Burra Charter* (Australia ICOMOS 2013). A copy of the *Burra Charter* is available at <http://australia.icomos.org/publications/charters/>.

The *Burra Charter* is widely accepted and adopted as a standard for conservation work. The Charter has been endorsed by the ACT Heritage Council. It includes definitions for commonly used terms as well as guidance for best practice conservation.

The content and structure of a CMP may vary depending on the place and the relevant issues. The following are guidelines to assist property owners in commissioning CMPs and consultants in preparing CMPs.

STRUCTURE

A CMP should include the following components. Some sections are not necessary in all CMPs and will depend on the place and the relevant issues.

- Title Page
- Notice of Approval (to be inserted after the CMP has been approved by the Heritage Council)
- Executive Summary
- Table of Contents
- Introduction
- Evidence of significance
 - Description
 - Historical Overview
 - Evidence of other values (eg. technical or creative achievement, aesthetic, scientific, social)

- Significance
 - Analysis of Significance
 - Statement of Significance
- Development of Conservation Policies
 - Constraints and Opportunities
 - Conservation Policies
- Scope of Works (optional, and possibly as an appendix)
- References
- Appendices
 - Brief
 - *Burra Charter*

CONTENT

This section explains in detail the contents of a CMP.

Title Page

The Title Page should identify the subject of the CMP, the location, author/s, date and status (eg. preliminary draft, final draft etc). It should also identify the client.

Executive Summary:

The executive summary should provide a brief summary of the process followed and the key findings and recommendations of the CMP.

Introduction

The introduction provides background information on the study. It should include:

- *Location* of the place, including legal property description and a location plan.
- *Brief* – a summary of the brief stating the purpose of the report. The actual brief can be included as an appendix.
- *Authorship* – clearly identifying all authors of the report.
- *Client* – identifying who the report was prepared for.
- *Limitations* – noting any areas the report does not cover (e.g. if access was not available to some parts of the place), and whether the CMP complies with the *Burra Charter*.
- *Statutory Listings* that already exist should be noted (these will also be discussed under the constraints and opportunities).
- *Definitions* – noting any specific definitions used in the report (e.g. definitions consistent with the *Burra Charter*). This can be done by reference to the appropriate documents, such as the *Burra Charter* which should be included as an appendix. It is not necessary to repeat the *Burra Charter* definitions, if the Charter is appended.
- *Acknowledgements* – identifying people (other than the authors) consulted in the preparation of the report.

Evidence of Significance

Description

The analysis of physical evidence should begin by providing the location of the place, including legal property description and a site plan.

This section will provide a discussion of the physical fabric of the place including a descriptive overview of the primary features within the place, with particular reference to features of heritage value. This section should start with a wider view focussing on individual elements as necessary.

For most places, a description of the landscape, plantings or garden areas should be included as well. Important plantings should be identified by genus and species names, as well as common names.

It is important for the description to consider how the elements might make up a larger significant group or space and to consider any important relationships between elements.

Locations of any areas considered to potentially contain subsurface archaeological features of historic or Aboriginal significance should be identified.

A site plan (preferably based on a survey) identifying key individual elements should be included.

Notes on the condition of individual elements and the probable causes of problems (if known) should be included in this section.

Photographs should be included to illustrate the description as well as to provide a record of the place at the time the CMP was written.

Key Issues:

- Where there are significant elements that require specific expertise (e.g. architectural, landscape or archaeological) an appropriate consultant or sub-consultant should be used.
- A description of each photograph, the date it was taken and the name of the photographer should be provided.
- Any plans should include a north point, scale and legend.

Historical Evidence

The historical evidence should examine available primary and secondary evidence about the place. This can include maps, plans, specifications, correspondence, newspaper articles, journal articles, photographs, sketches, paintings, oral histories and other sources as appropriate. Primary sources (relating to first hand involvement with a place) are preferable to secondary sources (where primary material has been interpreted). The source of any information, or figures used to illustrate the historical overview, should be provided and should be properly referenced.

The research of documentary evidence needs to be analysed against the physical evidence as part of the historical interpretation of the place.

It is often helpful to include a brief historical context at the beginning of the historical overview. This would include general information on the key dates and people involved with the development of the place. The history should be structured in a way that makes it easy to understand in the context of the known history of the ACT.

A summary of the chronology of the place is useful at the end of the historical overview.

Key issues:

- The history should normally be prepared by a professional historian.
- The historical overview should not attempt to be a history of everything to do with the place. It needs to be sufficient to understand its context and historical values.
- The history should address the broader historical context of the place, and not just focus on the place itself. Broader historical events are often important to an understanding of historical values.
- Where an existing history is available, this may be sufficient for the CMP or more work may be required. An existing history should be critically reviewed by an historian for errors as well as to ascertain what, if any, information has become available since it was prepared. This is not exclusive to events that have occurred since the existing history was prepared. It should also consider resources that have since become available such as digitised archives and newly released archival documents. The historian should also assess the existing history for its adequacy for the CMP.

Evidence of other values

Places can have heritage significance for reasons other than historical values. Section 10 of the Heritage Act 2004 sets out the criteria used for assessing whether a place has heritage significance. These criteria include Aboriginal values, ecological values, creative achievement, aesthetics and social values. Evidence for each value should be considered by a consultant with the appropriate skills and knowledge. The evidence of these values may, in most cases, be included in the documentary and physical evidence as long as they are adequately considered.

Key issues:

- Identifying social value is one aspect of CMPs which is often not undertaken or is poorly undertaken. To determine if a place has social value it is suggested that an expert sub-consultant be engaged to undertake this research, possibly including a survey of community attitudes about the place.

General

The evidence provided in this section of the CMP must be presented to demonstrate the heritage significance of the place and the features intrinsic to the significance. Any claims made in the Statement of Significance must be supported by the physical, historical or other evidence.

Significance

Analysis of Significance

The heritage significance of the place should be assessed against the ACT criteria (s.10 *ACT Heritage Act 2004*). If the place meets one or more of these criteria, it is considered to have heritage significance under the *ACT Heritage Act 2004*.

In those cases where a place has previously been assessed, the CMP is an opportunity to retest, review and reassess significance. The Heritage Council acknowledges that some citations on the ACT Heritage Register are quite old. In some cases, more information has become available and best practice assessment of significance has evolved since the citations were prepared.

Owners or managers may decide to recognise and manage places for heritage values which do not meet the threshold for registration, as well as those which do.

Key issues:

- The analysis of significance should include a comparative analysis with other places with similar values.
- The analysis should be clear about which values are above the threshold for registration under the Heritage Act, and those values below the threshold. A CMP can address both categories of values if desired.
- In the case of the criteria, a reference to “the community” means the ACT community.
- In the case of criterion (h), there have to be strong or special associations, and the person, group etc must also be important in local or national history. For example, just because a significant person lived in a place for a period, does not necessarily make it significant under that criterion.
- Also under criterion (h), in the case of architects or other designers, there has to be a strong or special association beyond the normal relationship between a designer and the place designed. For example, not every place designed by an important architect will be significant.
- Under criterion (j), the place has or be likely to contribute *significantly* to a wider understanding of history. It is not just *any* contribution.

The Heritage Council is preparing a document “Heritage Significance Criteria and Thresholds – Guiding Principles” to provide more information.

Statement of Significance

A Statement of Significance that provides a concise summary of the heritage significance of the place should be prepared. It must address whether or not the place is significant, why it is significant and how significant it is. The Statement of Significance underpins arguments for conservation of the place and will guide the policies and management recommendations developed in the second part of the CMP. Whilst the Statement of Significance is to address the place as a whole, individual features of particular significance and items of movable cultural heritage may also warrant individual assessment or mention.

Features Intrinsic to the Significance of the Place

The features intrinsic to the significance of the place should be separately identified. These are sometimes called attributes, features, aspects or elements, and may be tangible (eg. fabric) or intangible (eg. a use).

The CMP should not rank the level of significance of elements of a place. Either the element or feature is intrinsic to the significance of the place or not.

Constraints and Opportunities

Discuss any management issues, constraints and opportunities that may affect the place. This could include, but is not limited to:

- constraints and opportunities arising from the significance of the place;
- statutory constraints (e.g. planning controls, constraints from statutory listings);
- management context including owner’s needs/brief;
- economic considerations such as the resource constraints of owners;
- stakeholder views; and
- condition issues.

Conservation Policies

This is to address the place and its setting, as well as individual elements identified in the CMP. The consultant may, for example, develop an overarching statement of conservation intent or policy for the place with numbered sub-policies relating to particular construction elements, garden, archaeological and landscape elements, as well as moveable elements. Policies should be included for:

- conservation of significant fabric, uses and associations;
- conservation of the setting;
- feasible and compatible uses;
- changes that may be made, including new development;
- meeting relevant statutory requirements (or in the case of unregistered places suggest requirements that should become statutory);
- interpretation of the significance of the place;
- management of the place;
- unforeseen discoveries;
- review of the CMP; and
- keeping records.

Actions recommended should be feasible in relation to available and reasonably anticipated resources. A table can assist in relating conservation policies to conservation actions, and show priorities.

It is important to be clear in the policies about whether actions “shall” or “should” be undertaken. “Shall” indicates that a policy or an action is imperative. While “should” still suggests that a policy or an action is needed, it implies some discretion in the application of the policy or action. The use of “shall” is encouraged by the Heritage Council, which will seek changes to draft CMPs where the use of shall is possible and justified.

Following the assessment of significance in the CMP and development of conservation policies, the CMP author should consider whether revision of the ACT Heritage Register entry is required. If revision is required, the CMP author should indicate what changes are required.

Key issues:

- Address the real issues facing the management and conservation of the place. Check with the owner/manager about the guidance they need, and their plans for the future.
- Provide clear, simple and easy to use policy guidance in one location in the CMP, not spread through several chapters. Readers of the CMP need to be able to find guidance quickly and easily.

Scope of Works

Where appropriate a detailed scope of works for stabilization, essential repairs and ongoing maintenance of the features identified as intrinsic to the heritage significance of the place should be provided. Works are to be itemised and ordered according to urgency (i.e. action now, within 2, 5, 10 years).

A maintenance schedule suitable for implementation by the place manager should also be prepared.

Where these elements of the CMP are lengthy, they may be better included as an appendix.

The consultant should liaise with the place manager to establish the feasibility of

particular works.

Referencing

Documentary and oral sources used in preparation of the CMP are to be properly referenced. Use of a consistent system of referencing is important and should include footnotes or endnotes or in-line referencing. The source of figures should also be clearly referenced.

Burra Charter

The *Burra Charter* should be included in all CMPs as an appendix with reference made to it in the text, including the policies, as relevant.

APPROVAL PROCESS

A CMP submitted for the approval of the Heritage Council will be reviewed by the CMP Taskforce of the Heritage Council. If changes are required to the CMP, the CMP Taskforce will provide comments to the party who has submitted the CMP. Once it is satisfied that the CMP is acceptable, the CMP Taskforce will recommend approval by the Heritage Council. This approval can be made by the Secretary of the Heritage Council under delegation.

The Heritage Council will issue a *Notice of Approval*. This notice is to be inserted into the document after the Title Page. All subsequent issues of the CMP are to include the *Notice of Approval*. One hard copy and one electronic copy of the approved CMP with the *Notice of Approval* is to be submitted to the Heritage Council.

Submissions

The following copies of the report are required at each submission:

- One bound copies; and
- one electronic copy.

In the case of draft or final CMPs which have been changed in response to comments or otherwise, all changed text should be highlighted.

The version number of the CMP should be clearly identified throughout the report by watermark or footer.

PUBLIC ACCESS TO CMPS

A copy of the approved CMP should be lodged with the ACT Heritage Library by the consultant, owner or manager. It should be noted the ACT Heritage Council will make a PDF version of the CMP available on its website.

These requirements may be waived where there are privacy or confidentiality issues, which should be expressly stated to the Heritage Council at the time of lodgement.

REFERENCES AND FURTHER INFORMATION

James Semple Kerr, *The Conservation Plan: a guide to the preparation of conservation plans for places of European cultural significance*, 7th edition, 2013, National Trust (NSW).

Australia ICOMOS, *The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance*, 2013

REVISION HISTORY

10 Feb 2015 Submission requirements updated.