

Sally Embree
Conservation Principles
Conservation department
English Heritage
1 Waterhouse Square
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9th May 2007

Dear Sally

Conservation Principles: 2nd consultation draft.

Thank you for this opportunity to comment on English Heritage's revised 'Conservation Principles' including the new policy and guidance section.

As you know, Heritage Link's membership, 81 voluntary heritage organisations, represents a very wide range of interests and therefore conservation attitudes, from whom it would be difficult and probably unhelpful to try and achieve a consensus. Members will respond to this second consultation from their own experience and points of view

Heritage Link however has concerns over the status of the document:

1. Although it is prepared primarily as an internal document for English Heritage to achieve greater consistency, we view its wider application with alarm. We are concerned that the Principles will be quoted as justification by local authorities, property owners, developers and their advisers with adverse effect on heritage protection and in fact we hear anecdotally that this is already happening. In particular the checklists under *New Work and Alteration* (para 95) and *Reconciling Conservation with other public interests* (para 102) could be open to abuse.

2. We are also concerned that the long awaited revision of PPGs 15 and 16, promised throughout the Heritage Protection Review, is not mentioned in the Heritage White Paper. We have yet to discover whether an amalgamated updated version will be included in the suite of planning policy guidance anticipated with the Planning White Paper. If detailed statutory guidance is not forthcoming, we would not wish to see 'Conservation Principles, Policies and Guidance' used as a substitute. We will urge CLG to bring out statutory guidance as that would have a weight that cannot be matched by English Heritage.

This second concern was voiced extremely strongly at our recent seminar for members on the Heritage White Paper in April but I hope you will take both points into account when considering the status and future function of the Conservation Principles.

It is probably fair to say that our members are in general agreement with Principles 1 – 6 but are concerned that the process of understanding values and assessing significance, and the guidance on conservation policies are matters of method and judgement not matters of principle. It could therefore be confusing that the whole document is referred to as 'Conservation Principles'.

Yours sincerely

John Sell CBE
Acting Chair