HERITAGE COUNCIL OF NSW

Guidance on developing a conservation management plan

White Bay Power Station

Verena Mauldon, Heritage NSW

Contents

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1. Guidance on developing a conservation management plan

The 2019-21 review of conservation management plans identified major concerns including that plans were too long, that they were written for experts rather than non- expert users, and their quality varied significantly. It was agreed that objectives should be to develop succinct, plain English, and well-structured plans.

These guidelines respond, suggesting the following solutions:

- providing enough information within the plan, but not too much
- summarising information in the main text of the plan and using appendices for more detailed information - only if more detail is necessary
- understanding the readers and users of the plan, and what information they will need
- writing the plan in plain English which avoids jargon and technical language.

2. Key messages

- Conservation management plans should be presented with a clear understanding of the audience/s for and users of it, with information targeted to meet their needs. It should also be written in plain English and avoid complex technical language.
- Clearly identify the item to be studied and its boundaries.
- Use a logical process to underpin the establishment of heritage significance (i.e. the *Australia ICOMOS Burra Charter* process).
- The statement of significance should provide a persuasive and coherent story about the heritage significance of the item.
- Factors that present possibilities or limitations provide the context for developing policies to guide the conservation and management of the heritage item. There should be a logical connection between the factors and policies.
- Policies are the core guidance about the future conservation and management of a heritage item. This includes managing changes to the item.
- Policies should help embrace opportunities and solve problems, so make sure that at least all the major opportunities and problems are identified and addressed.
- Policies should not endorse a specific project or development.
- Conservation management plans can be relatively short documents or quite lengthy, depending on the complexity of the heritage item.

In general, shorter, targeted plans are more likely to be read, understood, and used.

3. Who is this guide intended for?

This guide is intended for:

- owners and managers of heritage items
- people involved in developing a conservation management plan.

4. Purpose of this guide

This guide provides advice about developing a conservation management plan (CMP). It sits alongside the *Statement of best practice for conservation management plans*. The statement advises on the content and characteristics of CMPs, while this guide provides suggestions on how to approach the task of developing and writing a CMP.

The guide briefly discusses the role of conservation management plans and then it provides guidance about standard components of a plan. These are:

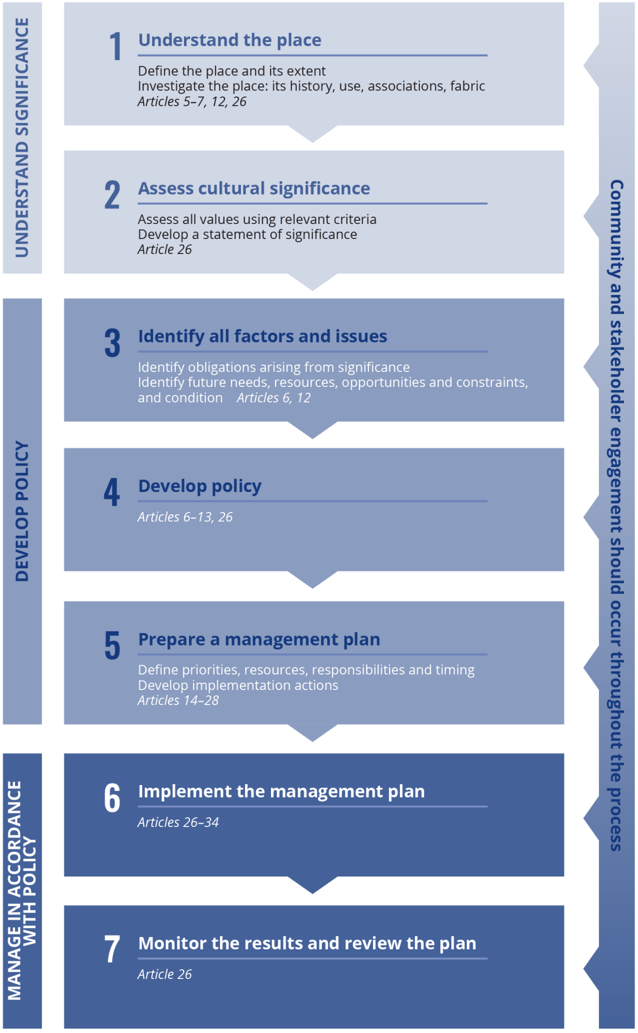
- executive summary
- definition of the heritage item, its boundary and what it includes
- outline of the process undertaken, and resources used
- evidence of potential significance
- analysis of evidence
- statement of significance
- details of factors that might limit or present possibilities for conservation and management
- policies to guide conservation and management
- references used
- appendices.

This guide is informed by the *Australia ICOMOS Burra Charter* and its associated Practice Notes as well as the *Statement on best-practice*. Another important reference is *The conservation plan: a guide to the preparation of conservation plans for items of European cultural significance* (Kerr 1985).

The whole conservation management planning process reflects a logical series of steps, as reflected in the Burra Charter process.

Conservation management plans are also sometimes called conservation plans or heritage management plans. There are several other key documents that are useful references in developing a CMP.

Refer the Heritage NSW webpages for guidance publications on investigating, assessing and managing heritage items.



The Australia ICOMOS Burra charter process

5. The process

Overall, the conservation management planning process is meant to reflect a logical series of steps, as reflected in the Burra Charter process. For example, the process includes gathering evidence, analysing it, reaching conclusions about heritage significance, documenting opportunities and limits, then integrating these in the development of conservation policies.

This research relies on a range of information sources related to significance, the nature and condition of the item, and its full management context. Some research may be quite straightforward, such as exploring the requirements and aspirations of the owner or manager. Other research may be more complicated, such as understanding archaeological features and intangible values. Drawing it together in a short, interesting, targeted plan that will be read, understood and used to manage the item and secure its future is the goal.

6. Guidance about standard components of a conservation management plan

The following sections provide guidance about the preparation and drafting of standards components of a plan in the form of key tips.

6.1 Executive summary

This section of the plan should be short and summarise the main messages of the plan. If there are important issues to note or findings to convey, then these should be included. The summary may also contain brief information about other aspects of the heritage item and the plan, such as the client/owner, heritage listings and heritage significance (a short summary, perhaps a paragraph, rather than pages of significance).

Busy people usually only read the executive summary – so write the executive summary with this in mind. If it is the only part of the plan that some people read, then what are the important messages to include?

6.2 Definition of the heritage item, its boundary and what it includes

An early task in developing a plan is to clearly identify the item to be studied and its boundaries. This may often be very straightforward and obvious, such as a house on a suburban block. However, with large or complex items this may require careful consideration if the whole item is not to be included (e.g. part of a rural property, factory complex or landscape). For example, this situation might arise where the item to be studied is historically part of a larger complex that is now in separate ownership.

If a whole item is not the scope of the plan, then important links or relationships to the whole item should be identified.

Another aspect to understanding what the item includes is to realise that it may be more than just the building on a block of land, it might include a garden or landscape, it might include Aboriginal sites or archaeological features. It might also include movable collections or intangible values that contribute to understanding the significance of the item.

What is the curtilage of a heritage item?

It is usually important to include land surrounding a building, structure, tree or attribute of importance to ensure that any development, including subdivision, does not adversely affect the setting, context or significance of the attribute. The land surrounding the attribute is known as a ‘curtilage’.

In many cases, particularly in urban areas and townships, the extent of the curtilage will be the whole of the property (e.g. a house and its associated block of land).

For example, see the below map of the White Bay Power Station, with the land recognised as important to understanding its significance marked in red.

Detailed information on how to define the curtilage of heritage items is in the publication *Heritage Curtilages.*

State Heritage Register

Gazettal Date: 2 April 1999

0 25 50 100 Metres

Scale: 1:2,000
Produced by: Michelle Galea

Legend
- SHR Curtilage
- Land Parcels
- LGAs
- Suburbs

An aerial view of White Bay Power Station over laid with the area defined as significant under its NSW State Heritage Register listing.

7. Outline of the process undertaken, and resources used

For readers to understand the strengths and possible weaknesses of a plan being developed, it is important to understand how the plan was prepared, and what resources were used in that process. For example:

- who were the experts who contributed to the plan and what is their expertise (eg. historian, archaeologist, architect, etc)
- was the *Australia ICOMOS Burra Charter* process adopted, or was a modified process used
- what was the process adopted for particular aspects (e.g. what method was used for social significance research, landscape survey or archaeological investigation)?

It is not necessary to discuss most information sources at this point (e.g. books, reports or historical records cited). These will be referenced in the body of the plan. However, if a historical resource or collection is the subject of a major research task, then this might be briefly discussed.

This section of the plan should also detail any significant gaps in research or information, or other limitations that might reduce the comprehensiveness of the plan. These gaps and limitations can also be helpful to know for any future update of the plan.

8. Evidence of potential significance

The logical process underpinning the establishment of heritage significance involves gathering evidence of potential heritage significance, analysing it, and then using these findings to prepare the statement of significance. Accordingly, gathering evidence is the important first step.

Heritage is often categorised as natural, Indigenous, or historic. Below are the common areas of significance:

8.1 Aesthetic

Can be related to architecture, interiors, landscape, other design qualities, and nature.

8.2 Historic

All items have a history, even if they are very recent.

8.3 Scientific

This significance relates to research potential, not the history of science, and for example can include significance arising from archaeological remains.

8.4 Social

Relates to items with strong or special contemporary community associations.

8.5 Intangible

Relates to community social significance, oral traditions, festivals, rituals and religious or spiritual values.

8.6 Comparative

Comparative significance are also used to determine the relative significance of heritage items:

- Rarity – is it the best example or a rare survivor of its kind?
- Representativeness – does it represent the historical themes that have shaped the state's history and development?

See the Australia ICOMOS Practice Note on *Understanding and assessing cultural significance* for more details about the significance.

It is important to have an open mind about the possibility of a wide range of potential significance, as not all significance will be obvious, or it will only be obvious to experts.

Identifying and gathering evidence requires research, such as in the many fields noted above (e.g. architecture, interiors, landscape, etc). A preliminary consideration of the heritage item by an experienced expert will often quickly identify the likely scope for research into potential significance. This is followed by research which will find the evidence or, in some cases, no evidence. If no evidence is found, no further research is needed.

Targeted research is an essential part of the process to develop a plan. It needs to be sufficient and thorough enough to support the development of a robust plan, without being open-ended or resulting in overwhelming detail that is not helpful to the purposes of the plan.

In some cases, potential significance only emerge after research is undertaken, for this reason the process should be flexible and accommodate emerging evidence. Additional research may be warranted.

The evidence can include documentary, physical and community evidence.

Further detailed guidance is provided in *Investigating heritage significance.*

9. Investigate evidence

In NSW the steps to managing heritage are to:

- investigate significance
- assess significance
- manage significance

Investigating, analysing and assessing evidence is a critical step in the process of establishing heritage significance to get the statement of significance. This is usually structured according to statutory heritage criteria that are relevant to the context, such as the State Heritage Register criteria. For example, one criterion reads:

> Criterion (a): An item is important in the course, or pattern, of NSW's cultural or natural history (or the cultural or natural history of the local area)

Each criterion should be considered for its relevance to the heritage item being assessed, and the evidence of potential significance. The relevant evidence should be discussed in relation to the appropriate criteria, in a process to assess:

- Does the item have potential significance relevant to the criterion?
- The level or strength of the significance?

Consider the wording of the criteria carefully as these contain important clues about what is needed to meet them.

The level of the significance is usually thought of in terms of local, state, national or world heritage significance, and the analysis should consider the threshold for such levels in reaching conclusions. In the case of the State Heritage Register criteria, state significance is the threshold, and evidence must be used to demonstrate how an item is significant for the State of NSW.

One aspect of the analysis is to compare the item being assessed with other items that have similar significance and attributes. This is referred to as a comparative analysis. For example, if a post office is being studied then it should be compared with similar post offices. In this case, a claimed significance of rarity for a post office in some aspect could only be sustained if it can be demonstrated that other post offices do not have this aspect, or there are very few with it. A comparative analysis is the tool that can be used to demonstrate comparative significance.

The analysis under each criterion should have a summary conclusion about whether the item has significance under the criterion and the level of that significance. The level of significance is sometimes expressed in terms of “meeting” the criterion, such as state significance under the State Heritage Register criteria.

Further detailed guidance is provided in *Assessing heritage significance.*

10. Statement of significance

If the analysis of evidence has been well-prepared, then writing the statement of significance should be a relatively easy task.

The *Statement on best-practice for conservation management plans* includes a number of important general points about statements of significance. They should:

- be succinct
- fairly reflect the full range of heritage significance of the item
- aid in understanding which significance are of greater significance and why
- link to attributes that embody or convey the heritage significance

The draft statement can usually be based on the summary text about significance that are supported in the analysis of evidence. Once this draft is prepared, the statement should be reviewed and edited to provide a persuasive and coherent story about the heritage significance of the item. Often, key words or concepts from relevant criteria will be included to make the link between the significance and the criteria clear. In any event, the statement should include an indication about which parts relate to which criteria. For example:

> The post office was the vital hub of communications in a wide region of New South Wales for over 150 years (Criterion (a)).

Based on the analysis, the statement should be as strong and powerful as possible, without distorting the claimed significance. Don't oversell the significance, nor undersell them.

If an existing statement of significance exists, such as from a heritage register, consider if it is still adequate or new statement needs to be prepared. If a new statement is necessary, draw upon the existing statement to cross-check it against evidence to make sure all justified significance is included in the new one.

The statement provides an overview of the item's heritage significance. It can also be supplemented to provide an understanding of how its components contribute to its significance. For example, a complex heritage item might include many buildings, landscape elements, relics, and movable heritage. The importance of these components can outlined in the statement to provide a finer-grained understanding of significance.

Some CMP authors use a grading system to present this information (e.g. components can be graded as exceptional, high, moderate, little, or intrusive). Such systems should be used with care as there can be potential problems as well as benefits as the ascribed grading can change due to the cumulative impact of change over time or as more is learned about the item.

11. Consider the opportunities and limits for conservation and management

The Statement on best-practice for conservation management plans lists a range of factors that need to be considered when developing policies to guide the conservation and management of a heritage item. There should be a logical connection between the factors and policies.

The factors listed in the statement are included below, along with additional guidance about each.

11.1 Factors arising from the significance of the item

Including what should be protected and conserved, and what might be possible to change, can components that detract from significance be removed or changed to enhance conservation.

11.2 The owner/manager's needs and aspirations

Including operational or management requirements, established or anticipated plans or proposals.

11.3 Legal and statutory obligations

Including planning controls and guidelines, land use and zoning, building regulations, and health and fire safety regulations. While the range of obligations may be very large, it is important to work out what are the most relevant ones to the item and focus on those.

11.4 Availability of resources

Including, expertise, finance, other resources. This is vital to achieving an effective plan. There is no point identifying a large range of expensive actions if there is no funding available to undertake them.

11.5 Operational and management requirements

Sometimes heritage issues are compartmentalised and considered separately from operational requirements. This may result in poorly integrated management of the item.

11.6 Physical condition of the item's fabric and its elements

Simple but effective conservation actions can arise from surveying the condition of a heritage item and working out what maintenance or other works are needed to address issues.

11.7 Uses, activities or practices essential to significance

It is not just the fabric of an item that may be important to conserve, things like historical uses or cultural practices and activities can also be significant and may require measures to foster their continued practice in situ.

11.8 Risks that might impact the heritage item

Including any arising from human actions, human-made hazards as well as natural forces.

11.9 Ability of the item to be adapted for new uses or to include modern services

This is a common issue as many heritage items are changed or updated to suit new or amended standards or requirements. The challenge is to make changes that are sympathetic, do not impact the heritage significance or involve only minimal impact. Further information is available from the Heritage NSW web pages.

11.10 Opportunities for heritage significance to be interpreted for the community

Including activities to support tourism and social participation and economic development. For some items, especially publicly owned items, interpretation of their stories and heritage significance is essential. Other items, such as privately owned and used items might consider small, less frequent opportunities, such as opening to the public as part of a heritage festival. Visitors to a private home or commercial building may be fascinated by its history, which can be told in simple and low-key ways.

11.11 Contribution of the item to the identity of the community

Again, this may be more relevant to publicly owned items. Heritage items can be a major contributor to a local community, such as a post office, hotel or park. Understanding and respecting these associations should be reflected in the plan.

11.12 External constraints

Including issues arising from location, environmental conditions, political and social circumstances. While many of the factors considered are within the heritage item, others arise from the broader physical and social context. Research for the plan should consider this broader context.

11.13 Proposed changes, new development or potential threats

Noting the plan must not be prepared to justify new development. These changes can arise within the heritage item or around it. Discussions should be held with the owner to identify any plans, and if they may also know about changes happening within the surrounding area. In some cases, it may be worthwhile consulting adjacent owners or the local planning authority to understand any proposals.

11.14 Issues and concerns held by others

Including external stakeholders or people with associations with the item. Heritage items often sit within a wider social context such as a local community. While such a community may not have a direct role in managing the item, it may nonetheless have strong associations with it, and care for it deeply. Understanding these issues and concerns is therefore important, and usually requires consultation.

11.15 Other factors or future needs

The existing use/s, feasible and compatible uses, setting, location, contents, related items and objects, as well as sustainability issues. Keep an open mind about the range of issues that might need to be considered in understanding limitations on or possibilities for the future management of the heritage item and the attributes that reflect the heritage significance. As noted above, those factors might be within the item or arise in the surrounding context.

11.16 Records of works

Best-practice management includes keeping records about works undertaken to an item. This enables a good understanding of how heritage items have changed through time, including what might be original, or dating from an important period, and what changes have been made at other times.

Not all the above factors will be relevant to every heritage item, and there may also be other factors to consider as well. The discussion of factors in the plan should aim to summarise information rather than present a very lengthy text.

12. Policies to guide conservation and management

The policies included in the plan are the core guidance about the future conservation and management of a heritage item, including the management of changes. The policies should help solve problems, so make sure that at least all of the major problems are addressed.

Policies should be relatively short statements providing a clear direction for managers. Policies are intended as high-level and enduring statements about the future conservation and management of a heritage item. These are often supplemented by strategies and/or actions, as more specific statements guiding outcomes.

Policies for change can be of two general types, that provide:

- specific guidance or answers regarding a change e.g. re-paint the building in original colours

- guidance about the process to be followed to develop specific guidance e.g. undertake paint colour analysis to establish colours from significant periods in the history of the building and develop a colour scheme in the light of its significance

The component containing the policies is best structured into sections because there may be quite of number of policies. There are several options, a commonly used options is, general policies, followed by those dealing with the conservation and management of attributes (e.g. landscape or garden, archaeology, buildings, objects, uses), as well as the setting, new development, interpretation, etc. For complex items, policies might be structured according to major components. Policies might also be structured according to the management regime (e.g. if there are different management units for different parts of the item, the policies relevant to each unit might be included in a separate section for each unit).

All of the factors raised above in Consider the Opportunities and Limits for Conservation and Management may result in policies. It is worthwhile crosschecking that every issue that needs to be addressed in a policy is dealt with.

Policies should not endorse a specific project or development, though they may provide general guidance about potential developments (e.g. the sympathetic location and form for development that does not impact significance), and the process to be followed (e.g. preparation of a heritage impact assessment).

13. References used

A list of the references (eg books, historical records and website information), used in researching the heritage item, or that otherwise support the CMP, should be listed out in a separate chapter entitled References. But only include references used and cited in the body of the CMP.

Do not include other references that are not directly relevant or actually cited in the CMP.

The list of references should adopt a standard and consistent citation format.

14. Appendices

Conservation management plans can be relatively short documents or quite lengthy, depending on the complexity of the heritage item. In general, shorter, targeted plans are more likely to be read, understood, and used.

One way to manage the length of information presented in a plan is to use appendices. This can enable shorter, targeted information to be presented in the main part of the plan, with more detail included in an appendix.

Examples of appendices might include a detailed history or description, a maintenance plan and schedules, and a copy of the *Burra Charter*.

As with all parts of the conservation management plan, only relevant or useful information should be included, and this applies to appendices as well. Links should be made between the main part of the plan and any appendices included. If there are no obvious links, perhaps the appendix is not needed.

15. Skills and expertise needed to research and draft a conservation management plan

Developing a plan usually requires a multi-disciplinary team with specialist skills and expertise. There are general skills as well as expert heritage skills. The general range of skills needed include:

- an understanding of heritage principles and processes
- organisational and leadership abilities
- an ability to work in a multi-disciplinary team
- an understanding of the process to develop a plan
- an understanding of the statutory context for the development of the plan (eg the *Heritage Act 1977)*
- research and consultation skills
- writing skills
- an ability to synthesise different inputs into a single, coherent text

An owner or manager of a heritage item may be interested and able to lead or contribute to the development of a plan. However, usually a range of other skills and expertise will be required as well, and subject experts can be employed. The heritage expertise required will closely relate to the potential heritage significance of the item. Examples of expertise related to assessing significance includes:

15.1 Aesthetic

Expertise might include archaeology/rock art, architecture, interior design, landscape architecture and fine arts.

15.2 Historic

The obvious expertise is history, however there are specialities within history that may be most appropriate (Indigenous history, mining history, labour history, social history and architectural history). In addition, the field of natural history, which includes the full range of sciences related to the natural environment, may be relevant.

15.3 Scientific

Expertise might include archaeology, and there are specialities such as Indigenous, historic and industrial archaeology.

15.4 Social

Expertise might include community-based research skills based in human geography, sociology and anthropology.

15.5 Spiritual

Expertise might include anthropology.

In addition, there may be other specialised issues to address which will need other expertise, such as material conservation, engineering, planning and horticulture.

A simple heritage item with a limited range of significance and good existing research and documentation may only require a very small team. However, a large and complex heritage item with many different layers of significance and poor current documentation will require a larger team with a range of expertise.

The range of expertise in the team should correspond to the potential heritage significance of the item. If additional potential significance become apparent, then the team might need to be expanded.

Guidance about assembling and managing the right team for drafting a CMP is provided in Appendix A. Information about the roles and responsibilities of a broader range of people and organisations is outlined in Appendix B.

16. Publishing and sharing conservation management plans

Conservation management plans should be publicly available as reference documents, unless there are good reasons for confidentiality. Sharing plans promotes a wider understanding of heritage items. This should include lodgement with:

- A local public library
- the local council
- on a publicly accessible website

Plans should also be provided to the Heritage Council of NSW.

17. Appendices

17.1 Appendix A: assemble and manage right team to draft plan

A key foundation for a successful conservation management plan is to assemble the right team to develop the plan. A well-organised, skilled and expert team will help ensure a good outcome for the heritage item, its owner/manager and the community. The team also needs a clearly identified leader to manage its work.

The comments above addressing the general skills and expertise that might be needed should be noted, especially those focused on the potential heritage significance of the item and specialised conservation or management issues to address.

Common issues with assembling and managing the team are listed below.

WRITING A CLEAR AND APPROPRIATE CONSULTANT BRIEF

For developing the plan – Heritage NSW has prepared a model brief, which may help.

PREPARING A REALISTIC PROJECT BUDGET INCLUDING FUNDING

To support and pay for the team. Team members can help estimate the cost of their work.

PREPARING AN EFFECTIVE WORKPLAN FOR THE OVERALL DEVELOPMENT OF THE PLAN

What are the tasks to be undertaken, who will undertake them, and to what timeframe? Again, team members can advise on these matters as they relate to their component tasks and should agree to the workplan.

ENSURING GOOD COMMUNICATION BETWEEN TEAM AND WITH CLIENT AND STAKEHOLDERS

The project team leader should consciously plan to facilitate, monitor, and ensure good communication, and to intervene when communication is not happening as it should.

DEFINING THE ROLES OF EACH TEAM MEMBER

Including who is to lead the team, avoiding duplication and gaps, and ensuring integration of the team's work – this is reflected in the workplan.

FINDING THE SPECIALISTS AND EXPERTS NEEDED

A key issue is to find experts with good, relevant experience. The local government/council heritage adviser may be able to provide suggestions.

ENSURING A GOOD QUALITY PLAN IS DEVELOPED

Based on a clear appropriate brief, a realistic budget, an effective workplan, good communications, defined roles and the right specialists and experts. Other measures might include the review of the draft plan by the client and other stakeholders, and a peer review by an independent heritage expert.

17.2 Appendix B: Roles and responsibilities

Developing a plan involves a range of people and organisations with different roles and responsibilities. These can be summarised as below.

CLIENT

For example, owner or manager. Usually responsible for commissioning a plan, developing the brief, arranging the budget, managing the project, providing information to assist with the development of the plan, reviewing the draft plan and generally ensuring that the plan addresses the client's key interests and concerns.

CONSULTANT TEAM

Responsible for the doing the project work, for all research, inspections, consultations (including inside the team and externally), analysis, drafting and development of the plan in line with the brief, statutory requirements and industry standards.

HERITAGE NSW

Responsible for administration of the Heritage Act 1977 and providing general advice about heritage items and conservation management, with a particular focus on items of state-level significance.

LOCAL GOVERNMENT/COUNCIL

Responsible for administration of the local planning and heritage systems and providing general advice about heritage items and conservation management, with a particular focus on items of local-level significance.

STAKEHOLDERS

There can be a wide range of stakeholders for a heritage item, including those who have cultural and other important associations, those who are knowledge-holders, and those deeply concerned with ongoing protection and management. Stakeholders can be a key source of information, and have important views and roles regarding constraints, opportunities and even management.

18. References

Approaches to the conservation of twentieth-century cultural heritage, Madrid-New Delhi Document (ICOMOS 2017)

The conservation plan: a guide to the preparation of conservation plans for items of European cultural significance (J S Kerr 1985, second revised edition)

Heritage curtilages

Heritage NSW webpages

Statement of best-practice for Conservation Management Plans

Statement of best-practice for Conservation Management Strategies

The Burra Charter: The Australia ICOMOS Charter for Items of Cultural Significance (Australia ICOMOS 2013) and associated practice notes.

19. Further information

Further information on the conservation and management of heritage items is on the Heritage NSW webpages.

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More information

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