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# Conservation Management Plans: An examination of obstacles to, and opportunities for, producing an effective management tool.

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## Abstract

Conservation Management Plans (CMPs) have the potential to provide effective protection of buildings and places which are identified as being valuable and significant to individuals, groups, and society at large. The modern-day CMP is based on the Burra Charter produced by Australia ICOMOS. The approach developed by Burra, and often now referred to as 'values-led decision making', has been adopted by international and national heritage organisations throughout the world. Conservation Management Plans have developed as a clearly identifiable process with the key stages having a logic and synergy.

The research was based on a literature review from which key issues and concerns regarding the effectiveness of CMP's were identified. This was followed by in-depth interviews with a number of creators and users of CMP's.

In order to be effective in protecting heritage places CMP's need be practical working management tools which are pro-actively used by the owners and users of heritage buildings and places. The research found that undue emphasis was placed on some stages at the expense of others which lead to ineffective management tools often being produced. The reasons for this are related to the interests and background of the creators and a lack of interaction with the organisations' culture and processes - and importantly a failure to engage with frontline staff. In addition, there were also resource and skill constraints within the client organisation.

Conservation Management Plans should be conceived and delivered as a long term management tool which protects the significance of the place by developing and implementing a 'values-led' approach which also acknowledges and integrates the culture and requirements of the organisation which is responsible for the heritage building or place. The research identifies those factors which might work against the production of an effective CMP and implicitly and explicitly identifies that which is required to make it effective.

## Introduction

Historic England recognises that changes in the historic environment are inevitable and that managing change whilst protecting cultural significance is a key challenge (English Heritage, 2008). To manage important places, it is first necessary to understand why they are important (Logan and Mackay,2013). As "significant places should be managed to sustain their values" (English Heritage 2008, p22) it is critical that cultural values are identified, understood and assessed (European Union and Council of Europe,2012). This is achieved by determining what is of value and why (Pendlebury,2013).

Appropriate care comes “through systematic management based on a thorough knowledge of both the material itself and on a detailed assessment of the situation and context in which it is found” (Hutchings and Cassar 2006,p.202). Systematic management can be achieved through conservation management plans (Hutchings and Cassar,2006). A Conservation Management Plan (CMP) “puts value at the centre of the process” (Cathedrals Fabric Commission, 2002, p11).

Whilst guidance exists on the key stages of CMPs there is limited reflection on what makes them effective. The aim of this research is to identify that which contributes to the development of an effective CMP.

### Research Methods.

Using an interpretivist stance, the research adopted a two-phased approach: a literature review and 13 in-depth, semi-structured interviews with a variety of CMP creators and users (Table 1).

Interviewees were selected using purposive and snowball sampling methods (Bryman, 2012). All of the creators interviewed had extensive experience of producing CMPs. Users were mostly drawn from those who commission and use CMPs across a large portfolio of heritage assets, plus three representatives of single or small portfolios.

The sample size was based on data collection reaching saturation point, i.e. there were no new emergent thematic patterns (Guest et al., 2006).

**Table 1:** Interviewees, job role and location.

Interviewee	Role	Location
<b>Creators</b>		
C1	Principal of small heritage consultancy	North of England
C2	Director and Associate Director of heritage consultancy	London
C3	Director of conservation for an architectural practice	Edinburgh
C4	Senior architect with national heritage consultancy	Bath
C5	Project manager specialising in heritage works	Midlands

C6	Consultant with recent experience at a national heritage organisation	South-West England
<b>Users</b>		
U1	Senior manager national heritage organisation	South-West England
U2	Senior manager national heritage organisation.	Northern England
U3	Senior facilities manager major London museum	London
U4	Properties curator at a national heritage organisation	Eastern England
U5	Development manager national heritage organisation	Scotland
U6	Project manager and project assistant for a Cathedral	South-West England
U7	Head of Conservation and Collection Care at an internationally important library	Southern England

## Literature review

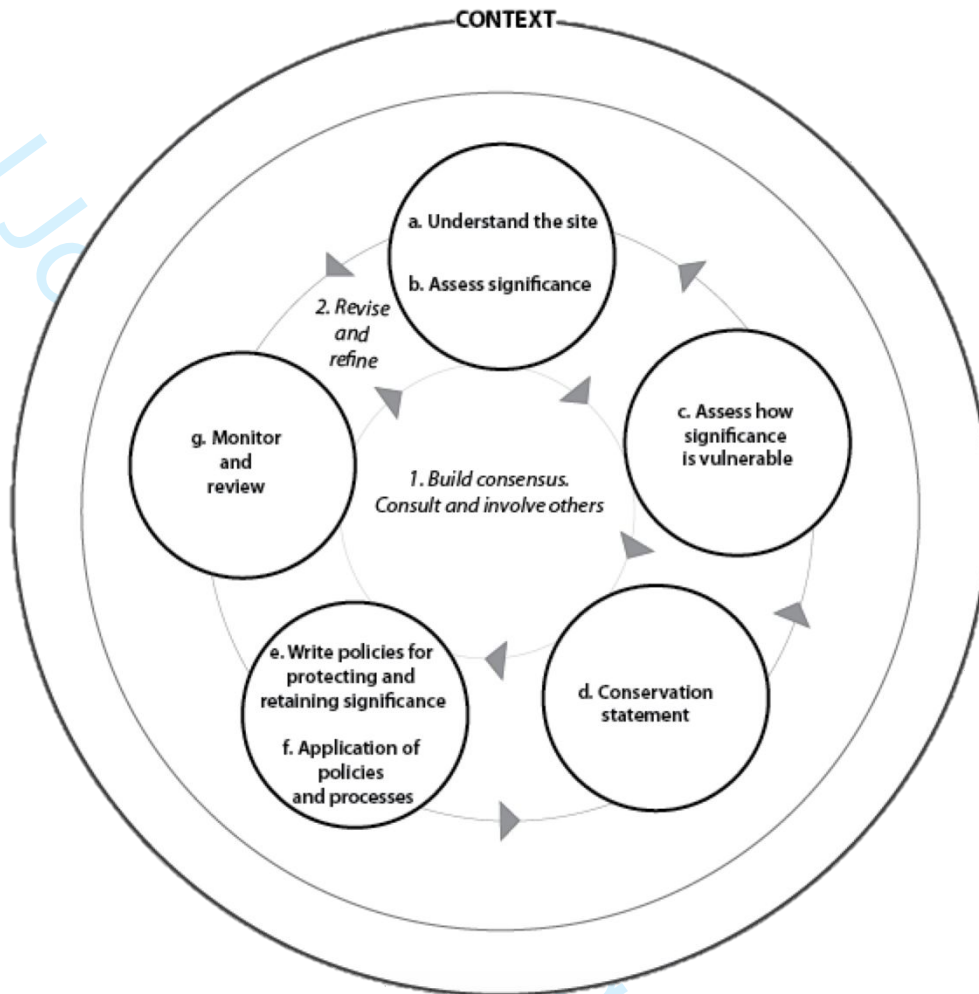
CMPs provide a framework and process for managing heritage assets in a way which protects heritage values (EH,2008). 'Traditional approaches' to conservation management focused on "resolving specific problems or issues without formal consideration of the impact of solutions on the totality of the site or its values" (Mason et al,2003,p1). Such approaches tended to assume significance rather than assessing it "through a rigorous, transparent and objective process" (Bond and Worthing, 2016,p57). A values-based approach uses analysis of cultural values before considering "how those values can be protected most effectively" (Mason et al., 2003a,p1).

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3 UNESCO(2013) suggest that the success of heritage management systems is  
4 dependent on the ability to: employ a values-led approach; deliver approaches that  
5 anticipate and manage change; invest in the relationship between heritage and society.  
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8 The 'values-based' approach emerged from the 1979 Burra Charter produced by  
9 Australia ICOMOS which set out a process based on codifying and utilising significance  
10 which was then further developed in Kerr's (1982) 'The Conservation Plan'. Mason  
11 (2006, p.21) states that "The important contribution of values-centered preservation is  
12 the framework it offers for dealing holistically with particular sites and addressing both  
13 the contemporary and historic values of a place".  
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20 Values-based approaches are incorporated in guidance from the major UK heritage  
21 organisations including Historic England, Historic Environment Scotland and the  
22 Heritage Lottery Fund. Historic England, for example, state that "Understanding and  
23 articulating the values and significance of a place is necessary to inform decisions about  
24 its future" (EH, 2008,p21). Internationally, World Heritage Sites (WHS) are required to  
25 have effective management systems and UNESCO recommends CMPs for each  
26 heritage asset (UNESCO, 2013).  
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33 There is a consensus within the literature regarding the shape and form of CMPs. This  
34 has been synthesised and represented in Figure 1.  
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**Figure 1:** Process of developing a CMP (adapted from Clark, 2001; and HLF 1998).

A CMP is intended to be a long-term management tool, which should inform and drive both strategic planning and day-to-day management. It is a continuous process (denoted by the clockwise arrows in Figure 1), with revision and refinement as the norm (denoted by the anticlockwise arrows). The stages set out below are essentially derived from the Burra Charter (Australia ICOMOS 2013a) and its associated documents which is, as observed, the source document for 'values-led' CMP's.

#### Stage 1:

- a. Understand the site – as it is now and how it has developed through time.
- b. Assess significance – both generally and contextually and in detail for each main element. This will include measures of relative significance.
- c. Assess how significance is vulnerable.

#### Stage 2:

- d. Write policies for protecting significance.
- e. Apply conservation policies at all levels of the organisation (i.e. develop action plans).
- f. Implement processes for monitoring and review.

Meile (2005,p.25) states “British guidelines depict plan preparation as a process that must come at the very point when one begins to think about a site's future before a site owner or developer is committed to a certain course of action”. Indeed the literature places emphasis on a two-stage process so that significance is assessed “away from extraneous pressures and without regard to those practical requirements which must subsequently be taken into account when developing policies” (Kerr, 2013,p.3). Whilst ideally both stages are carried out separately, they are co-dependent as identification of cultural significance and vulnerability has no real value in the context of the purpose of a CMP if stage two, the development and implementation of policies and actions, is not undertaken, and stage two will operate in a void if it is not derived from the logic and understanding arrived at in stage one (Worthing et al., 2013). However, most CMPs are a response to development proposals, whether because of a grant requirement or as a planning condition and a concern is that significance assessment may be skewed in order to ‘justify’ the proposed development.

The structure of this paper is based around consideration of the stages set out above, and their interrelationships, in order to draw out factors that may impinge on the effectiveness of a CMP. Although the primary research was based in the UK we suggest that many of the issues identified, and the interpretations and suggestions offered in this paper would apply elsewhere particularly given the universality of the use of Conservation Management Plans based upon the ‘values-led’ approach developed by Australia ICOMOS in the Burra Charter.

### **Understanding the site.**

The first stage in a CMP is to set out the physical characteristics and history of the place (Prince’s Regeneration Trust, 2009). This involves the examination and interpretation of the fabric combined with a study of primary and secondary documentary evidence. Kerr (2013, p.4) emphasises the importance of both field-work and desk studies which, “competently executed, will usually lead to a reasonable understanding of the development and uses of the place”.

### **Assessing significance.**



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3 Understanding significance is the heart of the process and should influence everything  
4 else. "This means that practical decisions take as their starting point the values of the  
5 place" (Church Buildings Council, 2012,p11). Mason (2006,p32,) observes that  
6 "Acknowledging and embracing the changeability of values and significance brings  
7 historic preservation in line with the dominant contemporary understanding of culture as  
8 a process, not a set of things with fixed meaning". Mason also states that buildings and  
9 places have different kinds of value for different stakeholders and that "understanding  
10 values in this way helps good decision-making." (Mason 2008).However, as UNESCO  
11 (2013) observes, there can be conflict between different values. The more explicitly  
12 values are articulated, the easier it is to recognise – and reconcile – potential conflicts  
13 (Church Buildings Council, 2012). It is therefore essential that values are identified, and  
14 are clearly stated within a CMP.  
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21 For a heritage asset, it is likely that some elements are of greater importance than  
22 others. Therefore the relative contribution of each to the significance of the place needs  
23 to be recognised (Australia ICOMOS, 2013). This will not only aid a better understanding  
24 of the place but also highlight those aspects which could be changed with little or no loss  
25 of significance (Kerr, 2013).  
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29 Although significance is a hierarchical concept, relative value is not quantitative, as  
30 'scoring systems' are prone to oversimplification and risk fostering misunderstanding or  
31 the misuse of an asset (Advisory Board for Redundant Churches, 2008). A common  
32 approach is to use 'soft' criteria such as exceptional/considerable/some/limited/unknown/  
33 no/negative, which differentiate without giving "the impression of absolutes or the sense  
34 that such things can be easily measured" (Bond and Worthing, p.110).  
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41 Kerr (2013) cautions that lower designation of significance does not imply that a feature  
42 is expendable. Dungavel (2009) also refers to concerns that removing elements of lesser  
43 value could result in undue harm to an asset overall. It is therefore important to have a  
44 holistic and contextual, as well as a detailed, understanding of significance. However, as  
45 Dungavel (2007,p.27) observes "if an element could not be removed without harming an  
46 asset, then indeed it must be significant. The failure to identify such significance is not a  
47 failure of the underlying approach, but rather a failure of the assessment". Bond and  
48 Worthing (2008, 2016,p110) suggest that "It is this area, the extent to which ideas of  
49 relative significance can be agreed upon, that can cause the most difficulties, both  
50 conceptually and in practice, but upon which the success of any plan arising out of an  
51 assessment of significance will, to a large extent, rest". However, a point ignored by the  
52 literature is that an element is likely to have a functional use irrespective of a negative or  
53 neutral heritage value. Therefore this may not indicate an opportunity for physical  
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3 change. However low value should be taken into consideration in any decision-making  
4 processes.  
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### 6 7 **Sensitivity to change**

8 An asset may incorporate elements with high significance but which are robust,  
9 alongside those with lower significance that are less robust and therefore more sensitive  
10 to change (Prince's Regeneration Trust, 2009). Although there is limited reference in the  
11 heritage literature, sensitivity to change analysis complements assessments of relative  
12 significance in understanding the place and making decisions about change. It also  
13 balances, to some extent, the subjective nature of significance assessments (Pearson  
14 and Marshall, 2005). Understanding the relationship between an asset's significance, the  
15 significance of its elements and the impacts of change on a particular element aids  
16 decision-making.  
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### 22 **Vulnerability**

23 Vulnerability assessment is a prerequisite for protecting significance (Prince's  
24 Regeneration Trust, 2009). However "its importance is generally 'understated'" (Rodwell,  
25 2002, p.47). Vulnerability assessments should deal with both present and future threats.  
26 Factors affecting vulnerability will vary between assets and contexts but might range  
27 from, say, climate change, to socioeconomic factors affecting the viability of the site, to  
28 more immediate threats such as poor physical condition.  
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33 Although Hutchings and Cassar (2006) recognise the difficulties in anticipating all the  
34 wider factors that may impact a place, there is criticism that the focus is often narrow,  
35 both in time and spatially, in relation to actual or potential threats to significance. Landorf  
36 (2009, p.507) in research on UK World Heritage Sites, found CMPs have "limited  
37 engagement with broader local, national and global trends" and Spennemann (2005)  
38 refers to an imbalance between the level of attention given to "slow acting decay  
39 mechanisms" compared to the 'indifference' to the possibility of disasters. Miele (2005)  
40 emphasises that it is imperative that CMPs show a greater awareness of external  
41 factors, which he identifies as the critical factor in the success of plans.  
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### 50 **Policies**

51 The creation of a set of policies and, subsequently, action plans, is the bridge by which  
52 significance is interpreted and integrated into strategies and daily procedures that  
53 conserve the asset. The literature (e.g. Australia ICOMOS 2013; UNESCO, 2013)  
54 recognises that without policies and action plans a CMP lacks effectiveness as an  
55 applied management tool.  
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57 Policies should clearly connect back to, and flow from, the assessments of significance  
58 and vulnerability (UNESCO, 2013) and show how the identified threats can be mitigated.  
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3 They should be precise and unambiguous in the way they are written, in their logic and  
4 their purpose (Kerr, 2013). Spennemann (2007) criticises the complex language used.  
5 They should be written specifically for the place and not be generic policies “copied from  
6 previous reports” (Australia ICOMOS, 2013b).  
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11 It is crucial that policies are capable of being implemented (Kerr, 2013). Critical to this  
12 will be the extent to which they will be accepted. Although successful implementation  
13 must actively involve site managers (Altenburg, 2010), users at all levels within an  
14 organisation must act upon policies (Australia ICOMOS, 2013b). CMPs should enable  
15 users to realistically address the factors and issues they face in conserving and  
16 managing the place (Australia ICOMOS, 2013b).  
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21 Developing policy can be complex, often requiring consideration of competing interests  
22 and values (Australia ICOMOS, 2013b). Previous research identified that creators and  
23 users regarded the development of policies and actions to be the least satisfactory part  
24 of CMPs. This was mainly because creators “often find the development of management  
25 policies both difficult and uninteresting” (Dungavell, p45, 2010). The assumption by  
26 Dungavell was that this was due to their background and training.  
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### 30 31 **Action plans**

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33 CMPs should contain both long-term and day-to-day actions (UNESCO, 2013). Action  
34 plans demonstrate the feasibility of policies, and the link between them should be clear  
35 and logical (Australia ICOMOS, 2013b, p.6). Action plans are the implementation phase  
36 of the management cycle without which “the Management Plan will be of little use” (EH,  
37 2009, p17).  
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43 Natural England (2008) suggest that actions should be divided into smaller potential  
44 stages to render them more easily deliverable. They also stress that they be prioritised  
45 by threat level or likely benefits. Dungavell (2010, p38) reported that plans have been  
46 criticised by clients for having “too many actions and not enough priorities”.  
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### 50 51 **Monitoring and review**

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53 National and international guidance on CMPs (e.g. EH, 2009; UNESCO, 2013; The  
54 National Trust, 2008) emphasise how important monitoring and review processes are to  
55 effectiveness. The CMP is “a statement of intent” and relies on implementation  
56 supported by a system of monitoring and review (Natural England, 2008, p.27). A CMP  
57 should be a ‘living document’, evolving as the “*proposed actions are implemented and*  
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3 *then monitored*" (UNESCO, 2013,p.85). CMPs are not static documents (UNESCO,  
4 2013) and perceptions of value may change over time. Therefore a CMP should be  
5 reviewed on a regular basis, normally every five to six years (EH 2009; The National  
6 Trust,2008).  
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11 Historic England (EH, 2008,p.48) state that regularly reviewed CMPs "can provide a  
12 sound framework for the management of significant places". Monitoring is necessary to  
13 determine whether the management system is functioning and identified outputs are  
14 being achieved within agreed timescales (UNESCO,2013). This facilitates the adaptation  
15 of policies and actions as necessary(UNESCO,2013). Key Performance Indicators  
16 (KPIs) should be developed for and from the CMP. They should measure both process  
17 and impact and have clear thresholds which, when reached, trigger an action in the  
18 management system (UNESCO, 2013; Australia ICOMOS, 2013a). Landorf (2009)  
19 noted that evaluation and review processes were lacking in the plans he studied and it  
20 has been recognised that indicators need to develop further (Alonso, 2012).  
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## 28 **Research Findings.**

### 29 **Significance and values.**

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31 Although it is sometimes argued that the adoption of value typologies is too reductionist,  
32 oversimplifying the assessment of an asset's significance, such typologies were  
33 recognised by all interviewees as an important component of CMPs. One referred to the  
34 "absolute necessity" of a value framework "because it makes people aware of complexity  
35 and potential range of significance" (U2).  
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40 Using qualitative measurements rather than numerical scoring was endorsed by all of  
41 the interviewees, Interviewee U2 commenting "We use qualitative measurements  
42 because we want to see definition underpinned by philosophy, we are looking for  
43 subtlety and nuance".  
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47 However, the language used in Historic England's (EH, 2008) Conservation Principles  
48 was criticised by some interviewees. Such language was "hard to take in" (U4) and "put  
49 people off" which could present "a barrier to its proper use" (C2). Also, different guidance  
50 uses different terminology and this can be confusing – particularly in the briefing process  
51 where there can be confusion between the parties about what is intended "especially as  
52 meanings keep changing" (C1).  
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56 Several interviewees highlighted how significance could change over time (C3, C4, U6),  
57 and the importance of the CMP in reflecting this. One provided an example of a Grade  
58 One listed asset where the key elements of significance had not been previously  
59 acknowledged, and other values had been based on an inaccurate interpretation of the  
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3 evidence. This had come to light during the CMP process (C2). The importance of the  
4 research process was emphasised during the interviews. Interviewee C3 commented:  
5 “The research is crucial...the significance can be completely different to what we  
6 originally thought”. As interviewee C1 observed, “If you don't get the research right then  
7 nothing else that follows is any good”. All agreed that the methodology used, the data  
8 accessed (and any limitations on this), and the way it was analysed should be clearly  
9 described. This supports the assertion that acknowledgment of sources used is essential  
10 as it “permits the evidence on which the assessment is based to be tested” (Kerr,2013  
11 P10).  
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17 All the interviewees agreed with the logic of a two-stage process and that a CMP should,  
18 ideally, be produced prior to development being considered. This was “in order that the  
19 [proposed development] scheme responds to the CMP and not the other way around”  
20 (C4). It was agreed by all the users, and the majority of creators, that a CMP produced  
21 as a result of a proposed development posed a danger that the significance assessment  
22 would be ‘skewed’ in favour of the development. A number of interviewees were aware  
23 of situations where this distortion had occurred. However, all the creators commented  
24 that most CMPs are commissioned as a requirement of grant-aiding bodies or the  
25 planning authority and therefore written at the time development is being considered and  
26 indeed “sometimes we're asked for a CMP halfway through the design process” (C2).  
27 However as Interviewee C2 observed, professional reputations are based on objective  
28 advice, even where this was not palatable to their client. Another suggested that  
29 ‘informed’ clients generally want to work with the asset's significance and that “doing  
30 things in the right way is better for the client in the long term” (C6). A user observed that  
31 whilst it is logical to have a two-stage plan, it usually does not happen ‘cleanly’ because  
32 the creator will be aware of what is happening at a site (U1) and another considered it to  
33 be unrealistic to think an assessment of significance could be performed without an  
34 understanding of a site's pressures and issues. She observed that CMPs “can  
35 sometimes be a bit woolly or flabby if it is for a site with no issues - the development  
36 proposal can focus the mind” (U4).  
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### 49 **Relative and comparative significance**

50 All the interviewees agreed that relative significance was necessary for conceptualising  
51 significance, and to identify where and how changes to an asset might take place, whilst  
52 protecting that which was culturally important by linking significance to the elements of  
53 the site. All confirmed that it was important to identify neutral, no and negative  
54 significance. As one observed “identifying relative significance including neutral and  
55 negative is essential as the only way [we] can manage change” by giving “a prompt to  
56 where work might go” (U3). An example was given by one of the consultants:  
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3 “it became clear that these 1950 extensions they weren’t constructed well, they were  
4 detrimental to the physical wellbeing of the building in the longer term but they also  
5 confused and arguably detracted from the architectural significance.” (C3).  
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8 However, whilst relatively low significance may indicate an area where change may  
9 occur it is necessary to look holistically at an asset as “Items of lesser significance may  
10 give context to other more important items” (U2). Further, the use of an element may be  
11 important and therefore change may not be straightforward. As one interviewee  
12 observed:  
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16 “it is important not to create a straightjacket for the organisation, the hierarchy is  
17 an important part of the process but this doesn't mean that higher significance  
18 elements cannot be changed, there might be functional reasons why this is  
19 necessary” (U3).  
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24 There was agreement that attributing relative significance was challenging, “because  
25 these are subjective measurements” (C3). Interviewee U2 observed that “multi-  
26 disciplinary groups find it harder to agree especially when it comes to relative  
27 significance”. This includes people within the client organisation where tensions between  
28 interested parties can occur (U6, C3). Tensions can also arise amongst those outside  
29 the organisation often due to the multiple interests of the external stakeholders, “who all  
30 think their area is the most important” and have different, and sometimes competing  
31 perspectives (U2).  
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36 Clearly, if different parties agree on levels of significance this helps to validate and  
37 strengthen interpretation, even if the judgement is based on different reasons/values.  
38 With a site that is culturally rich, the multifaceted aspects of significance reinforce the  
39 importance of that site. However, “if issues of relativity cannot be agreed upon then  
40 managing the place becomes difficult” (U2). The different perspectives on what makes  
41 something valuable may be in tension when decisions on change have to be made.  
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48 The majority of users felt that many creators assigned greater importance to tangible  
49 elements such as the architecture, over intangible elements such as people’s memories  
50 (U1). One interviewee (U6) stated “there is too much emphasis on physical elements”,  
51 and this was partially supported by C1, who stated: “you just go to the obvious that you  
52 are trained to do”. Another observed, “it becomes more difficult when the significance is  
53 nebulous” and that “intangible things actually make the process more difficult” (C2).  
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3 There was a general agreement that comparing places, *'helps understand overall*  
4 *significance'* (C4) although such comparisons were often carried out poorly, if at all,  
5 mostly due to lack of time and resources. One user observed that "if you have  
6 somewhere that is clearly very special then it is straightforward but if you have several  
7 places with similar qualities how do you rank them?" (U1).  
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### 11 12 13 **Vulnerability**

14 All the interviewees agreed that linking every vulnerability to a policy and indicating how  
15 each threat will be mitigated is both logical and necessary. Further, vulnerabilities should  
16 be categorised to show interrelationships (U2) which will aid the creation of coherent  
17 policies. However, a user (U3) observed it may not be possible to write a policy for some  
18 threats as "it's about what you can control". A creator gave the example of where there  
19 needs to be significant investment in the area in order to mitigate a vulnerability of their  
20 asset (C2). However, this can be recognised in a CMP and, possibly, policies written to  
21 help create opportunities or allow contingency planning.  
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29 The interviewees validated criticism in the literature of inward-looking, and short time-  
30 frame vulnerability assessments in many CMPs. One user observed that CMPs often  
31 overlook how changes in setting may impact negatively on 'sense of place' (U3).  
32 Interviewee U6 stated that an existing CMP had not considered linkages to heritage  
33 elsewhere in the city, and this was to the detriment of the plan, the other sites, and  
34 community understanding of their heritage. However, one creator suggested that it was  
35 not in her remit to look beyond the site nor to 'guess' long-term consequences of socio-  
36 economic change (C1). This highlights a dichotomy in the understanding of what a CMP  
37 should comprise.  
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### 45 **Sensitivity to change**

46 There was a near-unanimous agreement from the interviewees that mapping sensitivity  
47 to change was a potentially valuable measure which would complement relative  
48 significance in understanding the site and making decisions about change:  
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51 "it's part of the opportunity for understanding, you need to understand both before  
52 making decisions" (C2).  
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55 There was agreement that an element of higher significance might be more able to  
56 accept change without compromising its significance, than an element of lower  
57 significance. However, it was clear that CMPs do not routinely include identification of  
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3 acceptable limits to change. It was not clear why this was so, beyond one interviewee  
4 stating that it was not in the guidance.  
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## 8 9 **Policies**

10 Policy development and the ensuing action plan turn significance and vulnerability into  
11 management processes and actions. There needs to be a clear link between  
12 significance and vulnerability assessment, and the development and implementation of  
13 policies as “policies are how significance is applied” (U4).  
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19 There was a general agreement amongst both creators and users that policies were a  
20 weakness in many CMPs. Several reasons for this were perceived, mainly, but not  
21 exclusively, by the users.  
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24 A principal criticism that emerged from the literature is that policies were often  
25 generalised or vague. All the users agreed that this was a common issue, one  
26 commenting “policies in a previous plan for the site were so ambiguous as to be  
27 worthless for informing action” (U3), and another that a CMP contained “overgeneralised  
28 policies that were actually meaningless – definitely a common problem” leading to “a  
29 danger that the unique issues of the site could be overlooked” (U4).  
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35 Reasons for such vagueness included policies not derived from, nor driven by,  
36 significance and vulnerability assessments, and not adequately site-specific. In respect  
37 of the latter point, all the users agreed that often policies read as though they had been  
38 ‘cut and pasted’ from other plans. Despite this criticism, a number of the interviewees  
39 (C1, C2, C3 and U4) observed that similar policies appearing in different plans was not  
40 surprising given that common problems and issues arise on many heritage sites.  
41 Therefore there are policies “that are bound, to go into every conservation plan” and this  
42 needs to be distinguished from ‘cut and paste’ standardisation (C3). A creator suggested  
43 that some ‘off-the-shelf’ policies were reminders of good practice or reflected  
44 government guidance (C1).  
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50 There was consensus from users on the main reason why deficiencies in policies might  
51 occur – where creators were either uninterested in or lacked the skills to write effective  
52 policies. Interviewee U6 observed that the consultant “didn't really like the management  
53 bit of the conservation plan... he liked doing history etc. but not policy”. Another  
54 suggested this was “partly because they are not very good at it” but also that “they have  
55 not really engaged with the users” (U5).  
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3 An interviewee who had recent experience of working as a consultant and directly for a  
4 national heritage organisation noted that “many writers have a great enthusiasm and skill  
5 for the research but from policies onwards it’s almost as though they regard those bits as  
6 an inconvenience” (C6). Interviewee U6 stated that creators “are not the sort of people  
7 who are trained to actually take an idea and then transfer it into something that happens  
8 on the ground”. Another interviewee observed that “research and analysis is one thing  
9 but turning those into policies and actions [...] most consultants can say what’s missing  
10 but that’s not the same as writing a policy”. She went on to state “someone who is a  
11 historian would not have the skills to understand complex organisations” (C5). A creator  
12 with a background in architectural history gave validation to this observation stating “to  
13 be honest the fun bit is understanding the building, looking at its history, when it gets to  
14 the policies I do them but without much enthusiasm” (C1).

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21 There was a strong sense from users that insufficient attention was given to  
22 understanding and involving the organisation resulting in poor integration of policies with  
23 the existing processes and culture of the organisation. One observed “the problem is  
24 when the consultant doesn’t ‘get’ the organisation and therefore the plan as it evolves  
25 can often work against the organisation rather than with it” (U6). However, one creator  
26 observed “there often isn’t the opportunity nor funding to support a greater amount of  
27 cooperation and discussion between the team that’s writing up a plan and those that  
28 manage the site” (C3).

### 33 34 35 **Action plans**

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37 The action plan stage is where the overriding purpose of the CMP is, hopefully, realised.  
38 All of the users stressed the importance of this stage, but recognised it was often poorly  
39 handled or not implemented, with the consequence that “nothing filters down to those on  
40 the ground” (U5). One of the main reasons sites get ‘into trouble’ was when day-to-day  
41 actions are not managed properly (C5).

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47 The users emphasised that the problem was often grounded in the previous elements of  
48 the plan, particularly where policies were poorly written or impractical, including where  
49 the plan is “too vague and is rather a generalised list of best practice” (U5). However,  
50 they also acknowledged other factors. For example, Interviewee U4 observed that if  
51 there was a time lag between the stages of the CMP, the action plan was less likely to  
52 be developed and implemented. Another stated that “more exciting projects”,  
53 “organisational lethargy”, and a “lack of time” were factors and that the deficiency arose  
54 “partly as a result of the amount of time and effort that goes into plan up to policies - the  
55 organisation moves on and other priorities take over” (U1). For one organisation  
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3 implementation of action plans did not occur because their application “becomes messy  
4 and complicated due to a lack of people on the ground to apply the CMP” (U6).  
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9 All the creators recognised the importance of action plans. However, the clear majority  
10 stated that they neither expected, nor were expected, to be involved in them, with one  
11 stating it was not part of her skill-set or interests. However, three had sometimes been  
12 asked to draw-up ‘general guidance’ on actions (C2, C3, C4).  
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17 Two creators suggested CMPs were often seen by users as mainly a device to obtain  
18 funding rather than being a long term management plan. They considered this to be a  
19 primary reason why action plans were not developed (C3, C5).  
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24 Irrespective of the above points the majority of users agreed that, in part, the problem  
25 arose because creators lacked an understanding of the organisation and its processes,  
26 heightened because of the lack of involvement of end-users. As Interviewee U3  
27 stressed:  
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31 “...if it is not a working document if you don't have something for the operational  
32 people..... They are not going to look at and try and interpret the significance bit,  
33 they just want to get on with things”.  
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36 Several of the users (U1, U4, U5), and one of the creators (C3) stated that a major issue  
37 was action plans being implemented but without a timescale or review process. Whilst  
38 sometimes action plans have timeframes these tend to be project specific, i.e. there is  
39 no overview or implementation strategy (U4). The lack of KPIs to measure progress was  
40 perceived to be ‘a shortfall’ recognised by all the users, with the consequence that there  
41 was “no sense of how are we doing” (U5).  
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## 48 Discussion

49 The research highlighted a range of possible barriers to effective implementation of  
50 CMPs:  
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53 There should be synergy between each stage of the CMP, with each stage seen as  
54 equally important. Although the assessment of significance increases understanding of  
55 what is important, it will not, in itself, deliver value-led decision making. A clear theme  
56 from the literature, largely confirmed by the primary research, was that the importance  
57 and time given to each stage of the CMP was often unbalanced, a point supported by  
58 Dungavell (2010,p46): “Plans fail to be used because they focus on understanding the  
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3 site rather than how best to achieve the desired conservation outcomes". This may  
4 reflect a tendency, in any type of project, to frontload activity, but can also relate to the  
5 skillset and interests of the creators. This, in turn, exacerbates the consequences of  
6 failing to engage with the users at all levels, including users not buying into the plan, and  
7 the production of policies and action plans which lack viability.  
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13 All the interviewees stressed that relative significance is crucial in understanding the  
14 place and identifying elements which can change without damaging significance. All but  
15 one of the creators identified attributing relative significance as a challenging part of the  
16 process. This is perhaps not surprising, particularly when balancing quantitative  
17 attributes such as 'the oldest' or 'the most complete' against more qualitative social  
18 attributes. The challenges of assigning relative significance also highlights issues about  
19 membership of the creator team. Whilst multi-disciplinary teams may recognise a wider  
20 range of values, thus reinforcing the overall significance of a place, this can make  
21 agreement on relative significance more difficult. However single-disciplinary teams may  
22 not fully recognise the relative significance of some values, or overlook them altogether.  
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29 Another difficult issue occurs where aspects of a place are designated as neutral or  
30 negative significance but which have an important function. Problems may also occur  
31 where an element of high significance is deemed vulnerable due to the current activities.  
32 This may include factors such as wear and tear on important fabric, or excessive noise  
33 and activity that diminishes a sense of place. Such tensions may be easier to resolve, or  
34 avoid, where the creators understand existing organisational requirements at an early  
35 stage and the concerns of users at various levels.  
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42 The research revealed other reasons why there may be a sense of disconnection in the  
43 plan. It should be possible to read a CMP 'backwards' from the action plan and discern  
44 clearly the logical and procedural thread emerging from the understanding of the site  
45 and the assessment of significance and vulnerability. This not only demonstrates  
46 synergy in the process but also allows those using the plan to see and appreciate its  
47 purpose and logic. This linkage can be broken by failure to develop policies that directly  
48 and explicitly address all the identified threats to significance. The evidence from both  
49 the literature and the primary research is that both the policies and action plan stages  
50 are commonly the weakest elements of a CMP – with the latter sometimes, perhaps  
51 often, not being completed at all. Again this raises the question of the skillset and  
52 interests of the creators but also highlights the risk of a lack of commitment or ability  
53 amongst users to complete the process by ensuring that action plans are delivered.  
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There was a notably high level of congruence regarding the main deficiencies in policies identified by the literature and the user interviewees. These included overgeneralisations, vagueness, 'cut and paste' from other documents, and impracticality. Policies which are vague or generalised of course also serve a limited practical use. A key factor in substandard policies, a notable theme arising from the research, is a failure to engage with and understand the organisation and its concerns, priorities, and processes. This might be even more acute where the organisation does not have heritage as its primary function, for example, a hospital. All but one of the creators felt that their own policy writing was relatively straightforward because it flowed from the assessment of significance and vulnerability; however, they acknowledged the validity of these criticisms.

Clearly, if the policy stage is not executed well the effectiveness of action plans will be compromised. However, a very strong message from the research highlighted that, irrespective of the quality of policies, there is generally a lack of evolution into effective action plans. It is important that the implications of the assessment of significance and vulnerability 'trickles down' through the organisation and permeates all actions so that, for example, stonemasons understand the significance of a wall they are repairing, and cleaners know the value of the floor or artefacts they are cleaning. This deficit may be due to factors already emphasised - lack of skills or interest from creators (potentially reflecting an imbalance in the creator team), and/or a lack of engagement with the organisation, its users and existing processes. However, it was also clear from the research that in many cases the creators did not expect, nor were expected, to develop the action plans or be involved with them except in a superficial way. There was a sense from the users that the lack of effectively developed action plans was, primarily, the responsibility of the organisation. Time lags between the stages sometimes lead to what two users labeled 'organisational inertia' – due to so much time and effort being spent on the plan that detailed action gets sidelined or organisational priorities are refocused on changed priorities. It can be interpreted that sometimes the 'inertia' may be the result of a failure by the organisation to ensure that day-to-day staff appreciate, and commit to, the usefulness of the process. As one user observed, 'there is an obvious need to get staff at all levels to get involved and buy into the process. There is still work to be done in educating people on this' (U4).

Even where creators were not expected to be directly involved in action plans, the inclusion at an early stage of the CMP of those within the organisation who are responsible for day-to-day activities may bolster organisational commitment to completing the process and creators need to be pro-active in this matter. Here the

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3 assertion that it is essential that someone is responsible for implementing the action plan  
4 and acts as its champion is relevant (EH, 2009).  
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9 The criticism that policies and action plans are impractical or inadequate may lead to  
10 suggestions that they should be developed by asset managers. As Dungavell (2010,  
11 P46) observes, "Those whose training equips them to write the history of a site and  
12 assess its significance may not have the background (or even the interest) in asset,  
13 facilities or project management which would enable them to write clear, useful policies".  
14 The implication that more effective plans would result from 'handing over' policies and  
15 action plans may increase the danger of disconnection from the assessment of  
16 significance. Effective, value-led decision making would be enhanced by involving day-  
17 to-day users earlier and more productively, but also by ensuring that the creators are  
18 actively involved in action plans as well as policies.  
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26 CMP's need to be living documents which can be easily interpreted by users but this  
27 research highlighted that the language and concepts adopted can result in the alienation  
28 of users, resulting in the CMP not being adopted in a meaningful way. The very concept  
29 of CMPs, particularly the 'expert-led' nature of the process – and indeed the product -  
30 may also be a factor here. CMPs must be "clear, put into black and white language"  
31 (U1). Again the involvement of those 'on the ground' in the earlier stages is important. In  
32 reviewing CMPs for HLF, Stephen Bond observed that "as ongoing management tools,  
33 most were flawed [...] often because too little thought is given to what is required for  
34 management purposes" (Bond, 2009, p.22).  
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42 Even where policies and action plans are adequately developed the research revealed a  
43 lack of monitoring and review despite all the users recognising the importance of this.  
44 They were unanimous that this was a major failing on the part of their organisations. The  
45 users agreed that using KPIs as a means of measuring progress towards objectives is a  
46 valuable tool but they commonly saw these as either: ill-focused, mainly in the sense of  
47 not adequately addressing specific policies and actions; or entirely absent.  
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53 We have noted that the logic, coherence, and applicability of the CMP framework and  
54 process was substantiated by the research. However, an assessment which appears not  
55 to be generally used in CMPs, but which was agreed by the majority of interviewees to  
56 be a potentially valuable insight, was an understanding of sensitivity to change.  
57 Sensitivity to change as a measurement, applied both to the site as a whole and to its  
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3 component parts, would not only complement the judgements of relative significance in  
4 identifying areas that could be developed without damaging significance, but would also  
5 add another dimension to understanding the place.  
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10 The literature suggests that CMPs should ideally be in two stages with the first part  
11 being carried out without the influence of any development plans, which might  
12 inappropriately influence the assessment of significance in order to secure approval for  
13 the proposal. Ideally, and indeed logically, best practice would suggest that a CMP  
14 should be in place for all heritage sites, albeit with differing levels of detail and  
15 complexity according to the nature of the site, and that developments, as well as day-to-  
16 day activities, should be driven and dictated by the understanding of what is significant  
17 about the site and why. However, the establishment of CMP's, or at least a less detailed  
18 'statement of significance', is by no means universal - even for national heritage  
19 organisations. Some of the creators suggested that 'informed clients' see CMPs as  
20 useful management tools because they help with long-term planning but also,  
21 importantly, they introduce more certainty into discussions with local authority  
22 conservation officers. However in many cases, a CMP is produced because of a  
23 requirement by a funding body, and, usually, this relates to a development proposal.  
24 This may mean that the CMP will be viewed as a reactive 'means to an end' rather than  
25 a pro-active long-term management tool; as one user put it "too often life ends once they  
26 are written" (U5). Despite the risk of CMPs being influenced by a proposed development,  
27 most of the interviewees considered the influence of a development proposal on the  
28 assessment of significance as more of a theoretical, rather than an actual, problem.  
29 However, even if the development proposal in question does not skew the assessment  
30 of significance it may result in the CMP being overly focused on the proposal and its  
31 implications. This may influence both rigour and completeness. For example, it may  
32 restrict how far and how wide the CMP looks, exacerbating the possibility that  
33 vulnerability assessments are too narrowly focussed. It may also contribute to the CMP  
34 being less holistic in acknowledging and taking account of other processes and  
35 initiatives both within and without the organisation. More importantly this 'short-termism'  
36 may be a major factor in the unsatisfactory development of action plans, particularly if  
37 the funding body does not emphasise the need for them.  
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## 54 Conclusion

55 The idea that the CMP model originating in the Burra Charter offers a coherent and  
56 robust framework for developing effective management strategies and tactics was  
57 substantiated in the literature and unanimously agreed upon by the interviewees. A CMP  
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3 needs to be a practical working document and there was a clear sense from the  
4 research that many were not. One reason for this is where a development-driven CMP is  
5 not holistic and forward-looking and this limits its generic usefulness as a management  
6 tool. The production of a plan should not be seen as an endpoint but rather as a  
7 contribution to the ongoing process of value-led decision making. It is important to  
8 acknowledge that CMPs are time-specific, because circumstances change, as do  
9 perceptions of what is important and why. New evidence about significance may also  
10 emerge including a better understanding that may arise through the implementation of  
11 the plan itself. This may only occur where the CMP is seen, by all involved, as an  
12 essential long-term dynamic management tool which continuously evolves along with  
13 changes to the place, and how that place is viewed and understood.  
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22 The skillset of the creators is clearly an important factor in producing an effective CMP  
23 as this affects both the range of values identified and the ability, and willingness, to  
24 engage effectively with, and give equal weight to, all aspects of the process. The  
25 recognition by creators of the importance of working 'with the grain' of the organisation's  
26 culture and processes, and involving site staff from all levels, is essential as it is they  
27 who will have to realise the implications of the plan. This co-operation is particularly  
28 important in developing policies and action plans in order to ensure that both are  
29 practical yet remain driven and underpinned by the significance of the place and the  
30 relative significance of its different elements. Involving site staff at an early stage is also  
31 likely to allow users to recognise and understand the process and its outcomes and  
32 become engaged and committed to its logic and purpose.  
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41 The long-term success of the plan, however, lies in the commitment of the organisation  
42 to developing and delivering action plans and an effective monitoring and review system.  
43 The failure to do so was perhaps the most striking barrier to effectiveness revealed by  
44 the research. Action plans test that policies are workable, properly focussed and, along  
45 with monitoring and review, demonstrate the success, or otherwise, of the CMP. They  
46 are essential to the plan having the reiterative, synergetic, and responsive qualities  
47 intended, i.e. that it is a 'living', long-term management document.  
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53 Without KPIs there cannot be effective monitoring and review which addresses the  
54 questions 'where are we?' and 'how are we doing?' The limited discussion of key  
55 performance indicators in CMPs in official guidance/reports (and academic literature)  
56 makes it difficult to develop an understanding of their use, but our primary research  
57 bears out the assertion that KPIs are not routinely developed in a way that measures the  
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3 specific actions developed by CMP's. Indeed the sense from the interviewees is that  
4 meaningful indicators are not routinely used.  
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8 Value assessment is subjective and therefore dynamic, a quality that should be reflected  
9 in plans. Because of this subjectivity and fluidity, the methods used in the CMP research,  
10 the data accessed - and that which could not be accessed, and the interpretation  
11 process used, should be transparent, therefore allowing others to understand, evaluate  
12 and challenge the creator's assessments. All of the interviewees agreed this was  
13 important but this transparency did not seem to be routinely included in CMPs.  
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19 Finally, we would recommend that a sensitivity to change analysis should be routinely  
20 integrated into the CMP process, alongside the evaluation of relative significance, in  
21 order to aid decision-making about how change might be made without detracting from  
22 significance, as well as further enhancing the understanding of the place.  
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