



Historic England  
Guidance Team

[guidance@HistoricEngland.org.uk](mailto:guidance@HistoricEngland.org.uk)

The IHBC National Office  
Jubilee House  
High Street  
Tisbury  
Wiltshire  
SP3 6HA  
[Consultations@ihbc.org.uk](mailto:Consultations@ihbc.org.uk)  
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**Dear Sir**

**Consultation on Historic England's draft Guidance on dealing with Contested Heritage**

The Institute of Historic Building Conservation is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

We are pleased to have the chance to comment on the consultation document. The Institute's comments are as follows:

It is good to see, in the introduction, the acknowledgement that every element of the historic environment may be subject to contrary and divergent opinions among those experiencing it. As our knowledge and understanding concerning cultural heritage increases, the range of competing issues for critical analysis, and one might even suggest mediation, also increases.

The phrase '*contested heritage*' in itself causes unease because the contested nature confirms that it is the heritage of two or more parties, albeit from different perspectives. It is in the nature of almost all heritage

that it holds different values to different people.<sup>1</sup> Designations should seek to highlight the cultural context, the site, building, object or wider benefaction, and conflicting values. Virtually any building could have been built or funded by for example an exploitative person in relation to the workers or by an organisation that would not be supported politically in the present day. Another example might be that Cromwell's statue outside parliament probably has fairly negative connotations for Irish visitors, but it is there in recognition of his stature as a figure in our parliamentary history, not because everyone agrees he was an eminent historical figure.

If the public reference, name or statue, disappears, then so does the public's ability to understand the association with the deprecated origins of the whole benefaction not just its superficial manifestation. This considerably reinforces arguments in favour of retention with rigorous reinterpretation which takes account of a fully rounded cultural assessment. The document does not really get this message across strongly enough. We suggest that although paragraphs 1) and 2) of the document do this quite well but they give the impression that it is the interpretation of the, say, statue, that is the crucial issue when perhaps it should be expressly widened to include the whole site, building or wider benefaction.

Referring to negative views as '*alternative*' or '*counter*' narratives is not very helpful, as this implies that there is an orthodox narrative to begin with, which has never previously considered the negative sides of any historic figures. There are many pasts and they will be known differently from different views. The important factor is that none of the narratives individually is treated as 'right'.

Section 1 on '*What does the site object or building tell us about the past?*' refers to the Conservation Principles the content of which is still the subject matter of a current consultation. Suffice it to say that the statement that the '*historic environment is of value to everyone*' is a statement of fact rather than a principle as such. IHBC has addressed the draft /Conservation Principles in a separate response to HE already.

The statement in section 1 that '*Removing or destroying a contested asset could deny future generations the opportunity to understand all that the object, building or site has to communicate, including stories that make us uncomfortable*' is completely valid. However IHBC has concerns about the meaning of the sentence '*Removals can dilute or hide the reality of a complex history that has shaped who we are. It should be noted though, that, removal does not always equal destruction.*' Those

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<sup>1</sup> Aesthetic beauty for example may for some be subjective and some may even believe that design is a matter of taste. However designers and architects are taught design in a manner that has an established language and defined terminology which is not subjective.

concerns are raised particularly when considered in the light of the principles of the Venice Charter, 1964 and in particular Article 7: *'A monument is inseparable from the history to which it bears witness and from the setting in which it occurs. The moving of all or part of a monument cannot be allowed except where the safeguarding of that monument demands it or where it is justified by national or international interest of paramount importance'*.

An important distinction could usefully be made within this draft guidance between the significance of the physical structure or object, which is being considered for designation, and the importance of well informed and balanced interpretation and presentation of that structure or object. We suggest that for this document the key is in the interpretation, rather than in the designation or management of the asset itself –as this is the thrust of the document. To that end IHBC suggest that HE should consider reframing this document making *'Contested Heritage'* part of a bigger conservation picture particularly in terms of presentation and interpretation of monuments and sites. In that regard the fact that there is no reference to the ENAME Charter<sup>2</sup> is surprising. The principles within that charter could usefully inform the challenges in resolving the issues involved.

The purpose of the ENAME Charter<sup>3</sup> is to define the basic principles of Interpretation and Presentation as essential components of heritage conservation efforts and as a means of enhancing public appreciation and understanding of cultural heritage sites. Interpretation and Presentation are also usefully defined in that Charter.<sup>4</sup> In recognising that interpretation and presentation are part of the overall process of cultural heritage conservation and management, the Charter establishes principles, upon which Interpretation and Presentation should be based. These bear great relevance in the context of this draft guidance and are worth quoting:

- *Interpretation should explore the significance of a site in its multi-faceted historical, political, spiritual, and artistic contexts. It should consider all aspects of the site's cultural, social, and environmental significance and values.*

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<sup>2</sup> ICOMOS Charter for the Interpretation and Presentation of Cultural Heritage Sites, Quebec 2008

<sup>3</sup> That charter considers

*"What are the accepted and acceptable goals for the Interpretation and Presentation of cultural heritage sites?*

*What principles should help determine which technical means and methods are appropriate in particular cultural and heritage contexts?*

*What general ethical and professional considerations should help shape Interpretation and Presentation in light of its wide variety of specific forms and techniques?"*

<sup>4</sup> **Interpretation** refers to the full range of potential activities intended to heighten public awareness and enhance understanding of cultural heritage site'.

**Presentation** more specifically denotes the carefully planned communication of interpretive content through the arrangement of interpretive information, physical access, and interpretive infrastructure at a cultural heritage site'.

- *The contributions of all periods to the significance of a site should be respected.*
- *Interpretation should also take into account all groups that have contributed to the historical and cultural significance of the site.*
- *Intangible elements of a site's heritage should be considered*
- *The cross-cultural significance of heritage sites, as well as the range of perspectives about them based on scholarly research, ancient records, and living traditions, should be considered in the formulation of interpretive programmes.*

We suggest that the sentence at Section 2): *'This will allow a deeper understanding of significance, as well as drawing in a respectful and meaningful understanding of how communities feel about places, which should be an important factor in determining the best approach.'* is not clear enough about what is meant by *'the best approach'*. Is it the conservation planning or strategies for that particular place or is it the approach to the presentation and interpretation of that place? (If the guidance were reframed as suggested this would also become clearer)

The Australia Burra Charter<sup>5</sup>, which is not referred to in the document, provides some assistance about retaining associations and meanings: *'Significant associations between people and a place should be respected, retained and not obscured. Opportunities for the interpretation, commemoration and celebration of these associations should be investigated and implemented'*.<sup>6</sup> Further that *'Significant meanings, including spiritual values, of a place should be respected. Opportunities for the continuation or revival of these meanings should be investigated and implemented.'*<sup>7</sup> Also on Interpretation that *'The cultural significance of many places is not readily apparent, and should be explained by interpretation. Interpretation should enhance understanding and enjoyment, and be culturally appropriate.'*<sup>8</sup>

The national or international interest of a heritage asset usually increases with its link to historic conflicts – and conflicts tend to generate at least as many opinions as participants. Heritage policy should endeavour to put a protective veil around the whole range of memorabilia, not just the neutral, agreeable, and delightful.

The IHBC believes that the final sentence in section 3) on the second page is not complete, (as it has no full stop), but as drafted we suggest that it would be poor advice: *'Historic England believes that any new interpretations highlighting alternative and counter narratives should have equal prominence and quality to the original'*. This paragraph refers to

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<sup>5</sup> The Australia ICOMOS Charter for Places of Cultural Significance

<sup>6</sup> Article 24.

<sup>7</sup> Article 24.2

<sup>8</sup> Article 25.

contemporary physical responses to original assets. It would be undesirable in most cases for these to have equal prominence, although equal quality should be a requirement. Interpretation should provide equal weight to a range of views, but that's not the same thing. We also think it's highly unwise to include the sentence, *'In some cases it may be possible to alter the original statue, for example, to bring out a fresh meaning without destroying it'*, because although there are examples where this is the case, they may be a minority and it is not really very helpful to suggest it as an option.

Perhaps a more realistic way of addressing the issue would be to have fuller public consultation on listing proposals; but a wider casting of the net for divergent opinions and information on issues related to memory and identity. HE might consider various techniques to insure a more inclusive listing process. It might also be a way of ensuring for example that the technicalities of post-war building design were better understood by non-architects. Additional learning for listing advisors might also be a way of reassuring minority communities that their voice has been heard. Academic interest in the architecture of conflict remains unbroken, be it ancient, medieval, modern or contemporary. One might consider various techniques to insure a more inclusive listing process. It might also be a way of ensuring for example that the technicalities of post-war building design are better understood. Too often design faults are poorly understood and perhaps confused and considered to be associated with condition and possible remedial work. The subject of repair should not be allowed to confuse the assessment so it is vital in the context of listing of modern buildings that these technicalities are understood.

Another possibility would be to have a new national amenity society dedicated to ensuring that minority views are considered both in the heritage designation and management process. Sometimes it may be most appropriate to consign handling controversial issues to the informed experts rather than to those who have strong negative feelings about them.

Yours sincerely

A handwritten signature in black ink, appearing to be 'FN', written in a cursive style.

Fiona Newton  
IHBC Operations Director