

## **CifA response to HES Policy Statement consultation**

Submitted via online form on 3 December 2018

Link: <https://www.historicenvironment.scot/about-us/news/have-your-say-on-the-new-historic-environment-policy/>

### **Questions & responses:**

Previous engagement with stakeholders and the public has highlighted the need for us to be clear about what this policy is for, its status and how it should be used.

#### **1. To what extent do you agree or disagree with the following statements?**

The purpose of the Historic Environment Policy is clear – *Strongly disagree*

The status of the Historic Environment Policy is clear – *Strongly disagree*

I understand what the policy is trying to achieve – *Neither agree nor disagree*

#### **THERE IS NO OPEN RESPONSE ANSWER TO THIS QUESTION**

We are writing to you to supplement our answers to the online questionnaire. We feel that, if our response is to be usefully acted upon, it is necessary to provide our reasoning for, in particular, questions relating to the purpose, status, and intent of the policy.

Our answers suggested that we strongly disagree with the statements 'The purpose of the Historic Environment Policy is clear' and 'The status of the Historic Environment Policy is clear'.

We believe that the purpose of the document is extremely unclear. Whilst we appreciate that the document states that it is 'for everyone', we find this statement particularly unhelpful and would like to see the questions of '*what is HEP for?*' and '*how will it be used?*' answered, taking into account the issues of ownership of the document and its policies, its status, weight, audience, and application.

We note that HESPS set out these things much more clearly and thus was able to achieve far greater purpose in its statements. We can see that HEP has taken a different approach to broadening its potential audience, but the result is a document with apparently little utility.

It is of interest to us that in the article accompanying the launch of the consultation it was stated that it was an aim to use HEP to 'Consolidate HES' role as the lead public body for the historic environment'. We feel that this could not be further from being achieved. The document does not mention that HES is the lead public body and it does nothing to situate HES as a leader in terms of its roles and responsibilities and its commitments to work to the principles or policies in the document. Rather, this detail has all been stripped out. We feel that it would be a more influential document if it included details of HES' obligations and

actions, in order to show leadership and demonstrate the value of the principles and policies described. This would also provide a valuable test for whether the policies are clear and sufficient.

We stated that we neither agree nor disagree with the statement 'I understand what the policy is trying to achieve' this was because while we may infer an intention, the policy is not clear in articulating it. While we consider that the apparent ambition to take a broader approach to creating a high level document which could communicate principles which will be of relevance to wide audiences, we consider that this has sacrificed the majority of its utility in this attempt to make the document accessible and relevant to all.

We feel that this lack of a specific purpose is responsible for a number of the document's flaws, but not all. Please see our answers to the online questionnaire for more detailed concerns on the content of the document.

The online survey also asks whether we think that the HEP performs certain functions. It was not clear to us whether we were being asked if the draft HEP *successfully* performs these functions, or whether we think the HEP *should* perform these functions? We left this question blank in order not to commit ourselves to a meaning which we were unclear on.

We consider that;

- the document does 'promote an inclusive understanding of the values of the historic environment' – however this vision is lacking in clarity, consistency, and purpose,
- the document does 'promote people's participation in decisions concerning the historic environment, but its lack of a defined scope for its use means that the principles of participation are woolly, and lacking in great value,
- the document does not 'encourage a consistent and integrated approach to decision making in support of positive outcomes for the people of Scotland' as it fails to adequately position itself towards other aspects of Scottish Government's policy (e.g. NPF, HES's statutory roles, relationship with government, relationship to the planning system, relationship with other stakeholders)
- the document does recognise, but does little to add value to existing support for the 'vision and aims of Our Place in Time, Scotland's strategy for the historic environment'
- the document may reflect principles set out by international charters and conventions on cultural heritage and landscapes, but since none of these charters are mentioned directly and because the language used is so inconsistent, it would be difficult to read across with such commitments,
- the document fails to 'provide guidance for decision making affecting the historic environment' by virtue of lacking any specific reference to influential roles in the process of managing the historic environment.

We hope that our detailed comments are useful, but in summary we consider that this document needs to revisit its structure and consider its intended purpose. We believe that it should be possible to retain significant elements of the draft, subject to editing to ensure

that meanings are tightened, insecure or unqualified adjectives are stripped out, and the meaning and logic of the document is considered.

**2. Which of the following functions do you think the draft Historic Environment Policy performs?**

- Promotes an inclusive understanding of the values of the historic environment
- Promotes people's participation in decisions concerning the historic environment
- Encourages a consistent and integrated approach to decision making in support of positive outcomes for the people of Scotland
- Supports the vision and aims of Our Place in Time, Scotland's strategy for the historic environment
- Reflects principles set out by international charters and conventions on cultural heritage and landscapes
- Provides guidance for decision making affecting the historic environment

**The proposed name for the policy is the Historic Environment Policy (HEP).**

**3. To what extent do you feel this name is a suitable title, reflecting the policy's content and status?**

Neither agree nor disagree.

**4. Do you have any alternative suggestions for the title of the finalised policy?**

It is difficult to suggest whether the title is appropriate because the purpose, status, and audience is so unclear.

The word 'policy' connotes a directed course of action and, in an official context implies a certain weight. It is therefore an appropriate term which is likely to apply to various audiences with particular roles within the management of the historic environment. For example, HES staff and professionals involved within the planning system who have a responsibility to take account of any material consideration.

Wider audiences, such as individuals or organisations engaging with processes of heritage management, including owners of designated heritage assets applying for consent or grant aid may be influenced by 'policy' but are more likely to be influenced by 'guidance' where there is no direct obligation.

The HEP as drafted is currently with as an extremely high level and abstract exhortation to act according to broad principles and appears to desire to apply to 'everyone'. Without reference to any shared authority which applies to all relevant audiences, policy may not be the best word.

It is useful to note that Historic England's 2008 'Conservation Principles, Policies, and Guidance' was a document which officially directed English Heritage/Historic England staff, but which developed significant influence over wider audiences due to its positive contribution to understanding principles and providing useful guidance.

In the case of HEP, we think that the purpose and audience of the document needs first to be understood and an appropriate wording adopted to reflect this.

### **Challenges and opportunities:**

We have identified 14 challenges and opportunities in recognising, caring for and managing the historic environment.

To what extent do you agree or disagree with the inclusion of each of these challenges and their definitions?

### ***5. A holistic approach to the environment***

"Today's rural and urban landscapes are the result of human interaction with the environment. A holistic approach recognises that every part of a landscape has relationships with every other part. We have to look at each part of a landscape with reference to the whole, and recognise that natural and cultural benefits and outcomes are often interdependent."

#### **Agree**

In general, we believe that this section on challenges and opportunities is good, and its stylistic evolution (retaining similar content from HESPS) is positive. However, we do not think that the excellent infographic sits clearly alongside the sections which follow it in the HEP. The relationship between 'challenges/opportunities', and the 'core principles and policies' is not clear. There is some repetition, a lack of clarity as to the purpose of each section, and very little read-across between the challenges and the principles/policies in some areas. This makes it hard to recognise the importance of these challenges and opportunities or how the HEP suggests they should be addressed/capitalised upon.

To the left of the diagram, there is a paragraph which reads:

'To understand, manage and care for the historic environment, we have to be consistent. We also have to be sufficiently flexible and adaptable to deal with wide-ranging and ongoing changes to our society and environment. Our approach to this will be led by an agreed set of principles...'

However, the relationship between principles, policies, approaches, and challenges and opportunities is unclear and it is not easy to see how the 14 challenges relate to or are influenced by the principles that follow. Some of the paragraphs accompanying the challenges articulate the nature of that challenge/opportunity, whereas others actually describe principles or policy responses to challenges.

There is also a potential confusion of language. For example, the 'a holistic approach to the historic environment' refers to the understanding that 'every part of the landscape has relationships with every other part' (incidentally, this is not articulated as a challenge or an opportunity, but a principle). The same language of 'holistic' it is repeated in HEP1 which appears to communicate a similar idea, although broader. No link is made between the 'challenge/opportunity' and the Policy in the text.

Throughout this document, it appears as though the challenges infographic was written in isolation from the rest of the document and has significant read-across issues as a result.

This is an example of why we think the structure of the document needs significant alternations.

## **6. *Climate change***

"Our approach to decision-making affecting the historic environment must recognise and respond to ongoing climate change and support reductions in carbon emissions and waste."

Agree

We strongly agree with the statement. However, without any further policy or guidance on climate change it is unclear how HES will respond to the challenge and how others should.

Please also see our comments above on the overall lack of clarity on the relationship between these challenges/opportunities and the principles and policies which follow.

We find the development of the points made in the infographic to be lacking. For example, there are only 2 references to climate change in the rest of the document; in the managing change and working together sections, neither which have any substantial purpose to advance how the challenge could be met or opportunities capitalised upon. The second reference to climate change is particularly repetitive, simply re-stating that climate change creates challenges.

Is the intention to produce more detailed guidance on climate change challenges?

## **7. *Community participation and empowerment***

"The more people engage with and participate in decision-making affecting the historic environment, the more sound the decisions we make will be. Decisions about the historic environment don't just have an impact on the conservation of the historic environment – they also have an impact on people. Decision-makers need to weigh up potentially conflicting needs in an open and transparent way, so that everyone can understand how the decision was made."

Agree

We strongly support the principle of community participation and empowerment and understand the complex challenges that arise in attempting to encourage and mediate participation.

Again, this challenge/opportunity is repetitive of the principles under 'working together' and it is unclear how the statement above articulates a 'challenge/opportunity' and not a policy. The relationship between principles and challenges needs to be clarified.

Without further exploration, it is unclear exactly what HES recognises as the challenges or opportunities of community participation and empowerment. Community is not mentioned under the understanding and recognition or managing change sections.

### **8. Diversity and equality**

"Our historic environment should be accessible and provide a source of inspiration, enjoyment and learning for everyone. It should reflect the whole of our society. We need to think and talk about the past in a way that includes everyone, and that celebrates and recognises the diversity of our heritage."

Agree

Again, we support the principle of representation of diverse heritages and equal access to opportunities. However, this statement articulates neither the challenges nor opportunities in this area, and furthermore does not clearly link with policies and principles which follow. Language is used inconsistently and without clarity. For example, the representation of diverse cultural significance is mentioned under 'understanding and recognition', but such language is not used here. Whereas societal diversity is not mentioned in any other place (only one reference to diversity *of* the historic environment). This lack of precision and consistency in language and confusing structure makes it difficult to ascertain the value of the statement and the utility of the document.

### **9. Economic change**

"A strong economy supports effective management of the historic environment. The historic environment also contributes to inclusive and sustainable economic growth. We should always aim to maximise this, and make sure that people are aware of it. We need to be sure that our systems are flexible enough to handle changes in the economy."

Agree

Again, we broadly agree with the principle of the historic environment's contribution to economic growth. However, once again, we feel that this principle is not adequately developed or clearly related in the policies/principles which follow. As with other sections, it is not clear why this paragraph articulates a 'challenge/opportunity' and not a 'principle' for action – this is another example of how we feel that the structure of the document does not work.

We disagree that we ‘should always seek to maximise’ economic contribution. There is a necessary qualifier about sustainability which must be recognised. At present this sentence could be used to justify inappropriate change and would be at odds with other statements in this policy.

### **10. Funding**

“Not all elements of the historic environment can make enough money to cover the costs of maintaining them. The future of some sites will rely on external funding. There are difficult choices to be made about where to spend the available money, and not all sites and projects will receive funding. We have to be able to prioritise and think creatively about approaches to funding.”

Agree

Unlike many other areas in this section, this statement does actually articulate a challenge and is a valuable inclusion. It is less clear how this challenge influences subsequent principles and policies. Resources are mentioned again under working together in the context of competing demands, but this is simply a restatement of the challenge.

### **11. Intangible heritage**

“Established ways of managing the historic environment are based around physical, tangible things. These might be buildings, monuments, sites, places, areas or landscapes. Intangible heritage includes things that do not have a physical presence – things like stories, skills, or traditions. We need to improve our understanding of this intangible heritage. We need to celebrate and recognise it properly so that it can inform our understanding of the past and the decisions we take.”

Agree

We agree with the broad principle of recognition of intangible cultural heritage. However, it is not clear how this recognition relates to the principles and policies. It is not clear how this statement is a challenge and is distinct from the principles of action in the following section (where no comparable policy is mentioned).

### **12. Land management**

“Agricultural and land use practices and policies have an impact on our historic environment. They change constantly, so we must make sure that systems and principles for the management of the historic environment can accommodate and address these changes.”

Agree

We agree that land management has an important impact on the historic environment and we support the inclusion of the above statement in the HEP. However, as above, we find the structure of challenges/opportunities and the principles/policies confused. Additionally, we wonder whether this statement adequately addresses the relevance of the historic environment to informing and influencing land management, as well as responding to it. As with other sections, we do not recognise ways in which the principles or policies add to these statement (e.g. by developing sustainability principles or principles of holistic understanding of natural/cultural landscape, and realising potential by working with stakeholders in wider environment and agriculture sectors, communicate messages of heritage in the landscape, etc.).

### ***13. Creating and maintaining places***

“The places where we live, work and play are central to our wellbeing. The historic environment needs to be central to decisions about how we create, maintain and enhance our places. Ensuring places are sustainable, viable, vibrant and attractive is an ongoing challenge, and is central to the successful management of their character.”

Agree

As above we believe that making place-making a central aspect of work in the historic environment. However, as above we are unsure about the structuring of this point and its read-across to the principles and policies within the draft document.

### ***14. Regulatory change***

When regulations change, it can alter how decisions are made. This might include changes to planning law or environmental assessment law. When changes like this happen, we will need to take them into account. To make this possible, our processes have to be flexible, responsive and led by an agreed set of principles.

Agree

As above, we agree with this statement and its inclusion. However, we consider that this is as much a policy as it is a challenge and its relationship with the principles and policies which follow needs to be addressed.

### ***15. Roles and responsibilities***

“Taking care of the historic environment is a shared responsibility. Sometimes the interests of different groups and individuals overlap, and this can cause confusion and tension about roles and responsibilities. We need to make sure that everyone understands how and why key decisions that affect the historic environment are made.”

Agree

As above, we agree with this statement and its inclusion. However, what the challenge is is not clearly articulated.

The statement could be improved by articulating that heritage managers have a role and responsibility to mediate between groups. We also consider this to be an example of where the intended broad applicability of the document is actually likely to undermine its usefulness as because it attempts to be relevant to everyone from HES staff to general public, there is no meaningful discussion of roles and responsibilities. In this case, and indeed, in general, we think that there would be value to focussing on making good detailed commitments and reflections of HES roles, and providing specific information for certain other audiences. Doing this would allow greater demonstration of leadership from HES, which is entirely absent in this draft.

### ***16. Skills and capacity***

“Good management relies on decision-makers having access to the right skills and expertise to make informed decisions. We need to make sure that there is time and support for decision-makers to do their jobs effectively.”

Agree

This challenge has clear resonances across the document, but is not mentioned or related to any policies or principles. This challenge also highlights a confusion which results from the lack of clarity over who this document is for. Any statement of ‘we’ in regard to skills is likely to have hugely different significance depending upon what actors are the intended audience for this document. And without policies it is not clear how this challenge is likely to be mitigated or opportunities developed.

### ***17. Societal change***

“Our population is ageing and shifting. It is better connected than ever before. Our communities are growing and our lifestyles are changing. All of these things should influence how we manage the historic environment. We need to make sure that we are recognising and anticipating these trends, and that our systems proactively respond to them.”

Agree

As above, we agree with this broad principle and its inclusion. However, whilst this is clearly articulated as a challenge and opportunity, action in response to it is not elaborated upon in the principles and policies which follow. The relationship and ‘read through’ between these elements needs to be addressed.

### ***18. Sustainable tourism***

“Tourism brings huge benefits to the wider economy and specifically provides financial resources for looking after many historic sites and buildings. High visitor numbers can also affect the sites themselves, and create challenges for managing them. We need to make sure that we effectively balance these effects to secure long-term benefits.”

**Agree**

As above, we agree with this statement and its inclusion. However, we consider that this is as much a policy as it is a challenge and its relationship with the principles and policies which follow needs to be addressed.

### **19. Are there any gaps in the challenges and opportunities listed above?**

**Yes.**

As stated, we feel that there are structural issues with the definition and articulation of the challenges and opportunities and their read-across with the rest of the document. All of the 14 areas are important. However, some appear to be policies, not challenges, others are both, but only some are given reference within the principles/policies section of the draft, and most references are merely repetition. Currently, it appears as though the challenges infographic was written in isolation from the rest of the document and has significant read-across issues as a result.

### **Principles and Policies**

“The core principles in the draft Historic Environment Policy set out a shared understanding of how the historic environment should be managed.

The accompanying policies set out how these principles should be applied.”

### **20. To what extent do you agree or disagree with the following core principles for Understanding and Recognition?**

- A wide range of values can contribute to cultural significance
- Knowledge and information about the historic environment is critical to the understanding of our past, present and future. A place must be understood for its significance to be identified
- The historic environment evolves over time, and so does our understanding and appreciation of it
- We are all responsible for enhancing our knowledge and making it widely accessible

### **21. Do you have any comments on these core principles for Understanding and Recognition?**

We are concerned that the three areas in the principles and policies section do not comprehensively cover sector actions and motivation. We are confused with how the headings of each section relate to OPiT's 'Priorities' (Understand – Investigate & Record, Protect – Care & Protect, and Value – Share & Celebrate) and we are unsure that the high-level approach taken in this draft adds much to OPiT. There is also insufficient read-across between the 14 'challenges'.

For example, (notwithstanding our concern about the nature of the 14 areas) challenges relating to diversity, community, land management, creating places, and sustainable tourism have relevance to this section which is not explored. Other elements are mentioned (e.g. intangible heritage) but the description is often weak, adding little in terms of clear reflection on the challenge.

Furthermore, the 'how these principles are applied' text is full of loose descriptions, and repetitious or empty statements, with, again, a lack of direct read-across to the challenges (e.g. this section says "places are valued in different ways by different ... people" but there is no clear recognition or development of the challenge of representing diversity, or on the role of mediating differences as articulated in the roles and responsibilities challenge) and different language is used making the connection very difficult to actually observe.

We are also confused as to why the only reference to the HEP being a material consideration in the planning process comes in this section and is not stated in the 'what is the status of this document' section.

## **22. Do you have any comments on the policy for Understanding and Recognition?**

*"HEP1 – Decision-makers should adopt a holistic approach to the historic environment, incorporating an inclusive understanding of its breadth and cultural significance."*

We support HEP1, however, we note that the similarity of language to 'a holistic approach to the historic environment' in the challenges/opportunities infographic, and slightly different meaning. While we clearly support the challenges following through into principles and policies, we feel that this is both lacking clarity in the precise development of thinking from challenge to principle (setting out shared understanding) and policy (how the principle is applied). Rather the challenge statement is very similar to the policy in terms of its functional value, but also contains a confusing difference in scope/precise meaning.

## **23. To what extent do you agree or disagree with the following core principles for Managing Change?**

- Change has to happen for places to thrive
- Good decisions take a long-term view
- Good decisions are transparent, robust, consistent and proportionate

- Caring for our historic environment benefits everyone, now and in the future
- To manage the future of the historic environment in a sustainable way, its significance, and the significance of elements within it have to be understood
- Good decisions make sure that nothing is lost without considering its value first and exploring options for avoiding its loss

#### **24. Do you have any comments on these core principles for Understanding and Recognition?**

As stated above, we are concerned that there is insufficient read-through between the 14 'challenges' and the 3 headed sections of policies and principles.

For example, (notwithstanding our concern about the nature of the 14 areas) challenges relating to land management, creating places, sustainable tourism, have relevance to this section which is not explored. Other elements are mentioned (e.g. intangible heritage) but the description is often weak, adding little in terms of clear reflection on the policy.

There is also a concern with clarity of language in multiple places. Different terms of descriptions are used for similar concepts (e.g. 'special characteristics' or aspects of 'significance?'), certain descriptions are not complete (e.g. 'good decisions take a long-term view', *of what?*), or make reference to wider concepts without clear definition of the scope of those concepts (e.g. 'to manage the future of the historic environment in a sustainable way, its significance, and the significance of the elements with it have to be understood' *but is that all that is required to manage the historic environment in a sustainable way?*).

The statement 'Good decisions retain the cultural significance of the historic environment' potentially promotes confusion over what precisely cultural significance is – is this different from, say social significance, or environmental significance? Or is it intended to be catch all term for all significance? Is the word superfluous?

#### **25. Do you have any comments on the policies for Managing Change?**

*"HEP2 - Decision-makers should ensure that the benefits, understanding and enjoyment of the historic environment are secured for the long term.*

*HEP3 - Strategic plans and policies and the allocation of resources should protect and promote the historic environment. Where detrimental impacts on the historic environment arising from plans and programmes are identified and unavoidable, steps should be taken to demonstrate that other options have been explored and mitigation measures put in place.*

*HEP4 - When considering changes to specific assets and their context, significant harm should be avoided. Opportunities for enhancement should be sought where appropriate. Where detrimental impacts on the historic environment are unavoidable, these should be minimised and mitigation measures put in place."*

We broadly support the policies on managing change, however, there are a number of issues in regard to detailed wording and lack of effective supporting text.

For example, in HEP2, it is possible to read the policy as requiring absolute protection. The policy also does not reflect the complexity of balancing the desire to secure benefits from the historic environment with responses to challenges such as limited funding, conflicting or mutually exclusive benefits, wider balancing of sustainability, or competing economic or social benefits.

In HEP3, there is no explanation for the inclusion of 'allocation of resources' in this section.

In HEP4 the wording appears to create a 'significant harm' test, but without any definition of significant. The policy also introduces the concept of an asset's context, which is not defined.

### **Principles and policies: Working Together**

#### **26. To what extent do you agree or disagree with the following core principles for Working Together?**

- Everyone has a stake in the historic environment and how it is looked after
- Effective management is a collective effort
- Effective management should be undertaken in balance with the surrounding environment
- The best management involves empowering and involving communities

#### **27. Do you have any comments on these core principles for Working Together?**

Whilst we consider it a good thing that the HEP attempts to engage with Scottish Government agenda on community engagement, we consider that the content of this section of the document does not deliver policies of great value to this agenda. Most of the principles are unqualified and uncritical. The 'how the principles are applied' text hints at a range of relevant challenges (although not using the same language as in the challenges section) and explores at a very high level some issues of interest, but many of the statements are diplomatic truisms which have no explicit reference to unique situations likely to be faced within the historic environment sector (e.g. 'Rather than focusing on competing views... encourage dialogue and collaboration'). We do not consider that this adds a great deal to our sector's shared understanding nor advice on how to apply principles.

***HEP5 - Everyone should have the opportunity to enjoy our historic environment, to contribute to our shared knowledge and to participate in decision-making.***

***HEP6 - People should be empowered to benefit from the historic environment for the purpose of the sustainable development of their communities and places.***

## **28. Do you have any comments on the policies for Working Together?**

We consider these policies to be unhelpfully broad and lacking in utility. Both HEP5 and HEP6 simply restate the principles and does not provide any useful locus for their application.

### **Managing change guidance**

**Alongside publishing the new policy, we will review and refresh these guidance notes.**

#### **Are there any missing or any unnecessary?**

We do not believe that there are any unnecessary items. We do not currently have any comments on subjects which may need updating or additional items producing. However, we would like to stress that removal of guidance from HESPS and the absence of reference to new locations of this guidance, including the Managing Change documents, has the potential to create the perception that this guidance has been downgraded, and that it has less weight than it did under HESPS. A clear strategy for ensuring that the weight of the revised guidance (presumably equal to that of HEP and a material consideration) will be required to mitigate this.

We recognise that the purpose and intended audience for HEP is different to HESPS, but we are unsure that removing all signposting to the wider legislative and policy context is in any way beneficial. As stated elsewhere in these answers and in our accompanying letter, we think that if HES reconsiders what the HEP is for, how it will be used, and who will use it, it may become relevant to insert such signposts and references. The existing paragraphs in HESPS do the job of situating the document in its wider context well.

## **29. Is the glossary of key terms and definitions useful?**

Yes, but we are concerned that it has both introduced new definitions which could create issues of consistency when read with other policy and guidance.

We also recommend the following alterations:

*Mitigation:* This could usefully be supplemented (and in parts of the text replaced) with *offsetting*. The policy does not allow for compensating for the loss of fabric with an increase in understanding, which is a large part of what development-led archaeology is designed to yield. We also consider the use of the term 'unwanted impact' to be a concerning subjective and unqualified term which is a departure from recognised language in the planning system which could be unhelpful.

*Principles:* These are defined as 'core principles' in the text. The definition repeats description on the role of the policies as set out on page 6, but could also be taken as implying that the values which are articulated in other parts of the text are of less

relevance. We prefer the adoption of a structure which implies that the whole of the document is part of the relevant basis for policies.

*Value*: the definition talks of a range of beliefs that contribute to the concept of cultural significance. While all the adjectives are fair (and can fight for territory with those in the Burra charter, in the English/Welsh conservation principles and (different ones) in E/W planning policy, words like *contribute* (exclusive list or not) and *concept of* (redundant words?) aren't helpful

**30. Are there any terms missing from the glossary?**

**31.**