

Conservation Plan for Historic Buildings from Building Control Administration Perspective

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Abstract

Promotion of conservation plan has attracted more attention to the maintenance of historic buildings. However, conservation plan for historic buildings has diverse array of the major issues, particularly from building control administration perspective. It is the main aim of this paper to ask why this situation occurs and how it influences historic buildings conservation. The paper is composed of a critical review of existing literature, highlighting conservation plan implementation from building control administration perspective for historic buildings. Despite promotion and recognition, conservation plan often mitigates against its own implementation for historic buildings conservation. Unless implementation of conservation plan is improved, much of our culturally significant historic buildings will be lost to future generations and sustainable historic environment may also not achieve comprehensively.

*Keywords:*building control administration; conservation plan, heritage buildings; historic buildings; legislation

1. Introduction

Conservation plan is not new in the area of historic buildings conservation. It has been widely recognised in Australia, New Zealand, United Kingdom and globally. A considerable number of authors defined conservation plan—albeit with various understanding, interpretation and from different perspectives. Despite its inception in the 1990's, there is no well established study to ascertain whether conservation plan is workable or vice versa, particularly for historic buildings conservation. A significant number of authorities, experts and researchers claimed it is not. Others suggest that conservation plan may be workable only in certain areas in the buildings conservation industry. Some of its important links with historic buildings building control administration are still missing, particularly lacking in terms of authority. This paper reviews conservation plan for historic buildings from the maintenance perspective in both United Kingdom and Malaysia as well as in a global context.

2. Definitions

To date, a considerable number of authors have defined conservation plan through various interpretations. Kerr (2000) defines conservation plan as “a document that explains what is significant in a site (also referred to as a ‘place’) or building and reasoning why they are important and how their significance can be retained” (Kerr, 2000, p. 1). Conservation plan is formulated to conserve the “significance” of a building, site or place (Worthing and Bond, 2008, p. 47), either for “potential use” (Smith, 2005, p. 101) or for “future development” (Gard'ner, 2007, p. 156). In ‘*Conservation Plans: A Guide to the Preparation of Conservation Plans*’, Historic Scotland defines conservation plan as reference document used to identify relevant needs to achieve effective building maintenance (Historic Scotland, 2000). Meanwhile, ‘*Conservation Plans for Historic Places*’ by Heritage Lottery Fund (1998) defines conservation plan as policies used to understand the processes in maintaining and protecting buildings significance. Generally, a conservation plan is a well-developed policy to protect a building’s significance without jeopardising their future development. In the author’s opinion however, its definition relied heavily on

professional's and conservation organisation's opinion, who are directly involved in maintaining historic buildings. This has contributed to some related issues affecting its emergence and virtues.

3. The Emergence and Virtues of Conservation Plan

Chronologically, conservation plan was developed in response to both the initiatives of leading conservation bodies and support from building conservation charters. Initially, conservation plan was introduced by James Semple Kerr under The Burra Charter (Worthing and Bond, 2008). '*Burra Charter Process*' has set a logical sequence of investigations, decisions and actions upon buildings' significance (Pearce, 2000, p. 15; Worthing and Bond, 2008, p. 110) and this makes it "very similar" (O'Connor, 2000; Hudson and James, 2007) and "well resonance" with conservation plan (Whitbourn, 2007).

While Burra Charter and conservation plan are significantly similar, recognition gained by the latter however is achieved only at a very late stage. The Heritage Lottery Fund (HLF) was the first public body to promote and adopt conservation plan (see Clark, 1991a). In the UK context, conservation plan is widely recognised by national committees of International Council on Monuments and Sites (ICOMOS) (Gard'ner, 2007) and strongly supported by '*Conservation Plans for Historic Places*' documents (Smith, 2005).

Various supplementary documents have been widely published to support conservation plan. But, they are published with different emphases. To quote Worthing & Gwilliams (2002),

"'*Sustaining the Historic Environment: New Perspectives on the Future*' by English Heritage in 1997 has taken into account the contributions from all parties (including experts, local residents, politicians or even business people) that might make value judgment on built cultural heritage and its significance. Followed by '*Power of Place*' by Historic Environment Review Steering Group (English Heritage) in 2000 which emphasises on the need to understand (and debate) why particular places, sites or buildings are important and to seek the greater involvement of a range of stakeholders in such discussion and decisions that followed. '*The Historic Environment: A Force for Our Future*' by the Department for Culture, Media and Sports (DCMS), in 2002, refers to the role of management agreements and Conservation Plans in assessing the significance of specifically in deciding how to integrate changes and consider long term maintenance and management". (Worthing and Gwilliams, 2002, p. 564).

A considerable number of authorities also appeared to be implementing conservation plan. Collaborative efforts between English Heritage with major institutions (Miele, 2005) and statutory regulations of '*Review of Heritage Protection: The Way Forward*' (June 2004) by DCMS (DCMS, 2004) had recognised the significant role of conservation plan in England. While, in Scotland, Gard'ner (2007) claims that "Conservation plans was adopted in conservation planning process as a method for a better understanding of historic buildings" (Gard'ner, 2007, p. 156). Comparatively, '*Conservation Area Appraisals*' (Clark, 199b) is commonly championing the efforts in promoting the conservation plan in protecting historic building in Australia context. In local context, Malaysian 'conservation management plan' (CMP) of Section 97 of National Heritage Act 2005 (Act 645) (Kayan, 2006) and 'conservation framework' (see Ahmad, 2006) also share similarities with conservation plan.

Conservation plan may encompass many attached values connected to places, sites or buildings—cultural, historical, scientific, educational, aesthetic, social, economic and ecological values. These "values" need to be considered in the production, components and structures of conservation plan (Australasian Legal Information Institute, 2008, Heritage Council of Kilkenny, 2008). But, with regard to historic building conservation, its standard components, structures and processes with regards to building control administration scope of works are still unclear.

4. Components, Structures and Processes of Conservation Plan

As suggested by Clark (2000), Miele (2005), Gard'ner (2007) and (Worthing & Bond, 2008), conservation plan should include an understanding of buildings, sites or place and their cultural significance. Conservation plan needs to have "good written policy" (Atkins, 1999) and fair "judgement" on vulnerability of site significance (Worthing and Bond, 2008). Clearly, conservation plan is developed based on its fundamental association with the significance

of heritage properties. However, its distinct components, structures and processes for historic building conservation remained unclear and relatively compromised, particularly in building control administration scope of works.

Prior to its implementation, conservation plan should and be able to identify all the contradictory elements affecting buildings (English Heritage, 2005). These include any small cumulative alterations, loss of fabric, problems with mixed ownership, conflicts between different types of heritage, pressure from visitors or users and the need for better access (Stenning and Evans, 2007). Due to its complex implementation processes, it is difficult to ascertain the requirements of conservation plan for historic buildings conservation, particularly in determining the requirement of works essential for building control administration.

Conservation plan needs to be more authoritative, accessible and easy to read (Clark 1999a; Clark 1999b; Clark 2000), representing a good degree of consensus (Pendlebury and Townshend, 1997), thoroughly debated (Historic Scotland, 2000; Dann and Wood, 2004) and clearly explaining future use of buildings (Clark 1999a; Clark 2000; English Heritage, 2005). Worthing and Bond, (2008) asserts that conservation plan needs to “provide ready advice necessary, appropriate requirements and opportunities, basis for assessing change, reassurance of projects right direction for appointed heritage and funding agencies” (Worthing and Bond, 2008, p. 108). Clarks (1999a and 2000) suggests that conservation plan needs to explain building’s maintenance regimes (including building control administration scope of works) and legislative influence (Clark 1999a; Clark, 2000). From the above statements, unique components, structures and processes of conservation plan are caused by their very own requirements. This posed possible risks both to its benefits and deficiencies.

5. Benefits of Conservation Plan

On behalf of the grant or fund providers, in Clark’s opinion, conservation plan is useful in applying for grant from the funding organisations (Clark 1999b). Consequently, Worthing and Bond (2008) asserts that “in many cases, the reason that conservation plans are produced is to fulfil the requirement of either a funding body (such as Heritage Lottery Fund in UK), or a statutory consent authority within the context of a development proposal” (Worthing and Bond, 2008, p. 109). But, is conservation plan only prepared for the sake of applying for grant? Are there any possibilities for them to be produced beyond this ultimate reason, particularly with regards to scope of works stipulated in building control administration?

As a professional himself in the building conservation industry, Miele (2005) points out that the reason for conservation plan preparation is beyond grant, as he said: “Conservation plan is helpful for a full understanding of an historic building and protects certain areas within a building by setting parameters for further investigative or design works” (Miele, 2005, p. 31). Conservation plan acts as a “practical document” (Smith, 2005, p. 101) and a “useful tool” in dealing with political, resource, economic and community issues surrounding the conservation of heritage properties (Tavernor, 2007, p. 2). It can be concluded that the simple concept behind conservation plan masks a potentially powerful management tool in maintaining built heritage properties such as historic buildings.

Utilisation of conservation plan helps to achieve informed decision upon heritage properties. Atkins (1999) and Worthing and Gwilliams, (2002) suggest that by utilising conservation plan, heritage property managers will be more explicit, transparent, and open about their assumptions (Atkins 1999; Worthing and Gwilliams, 2002). Conservation plan is always seen as a downscaled version of “rescue operation” for heritage properties, a tool to prevent negative outcome either from new development or threats and a cost budgeting instrument to minimise major expenditure for conservation works (Clark, 1999b; Smith, 2005; Stenning and Evans, 2007).

A series of very effective implementation of conservation plan can notably be observed from a significant number of cases. They include projects commissioned by English National Trust (done by Inskip + Jenkins for Stowe and Mogerhanger), Historic Scotland, Allies and Morrison, HLF (Royal Festival Hall, London, St. George's Hall, Liverpool and for Somerset House in London) and The Heritage Council of New South Wales (NSW), Australia (Clark, 1999b). Conservation plan is an essential tool for those who are facing difficulties in making major decision either on new development or resolving conflicting types of building significance. But, there is still no clear indication on how it can provide reference point of strategic thinking of well-developed conservation approach and philosophy for historic buildings.

To date, benefits of conservation plan have been highlighted by the majority of professionals who are involved directly in building conservation. Conservation plan is important guidance for avoiding a dispute case reaching a court (Preston, 1999), reference that brings together all the related issues (Clark, 1999a), resolution for conflict (such ‘Sheffield Template’ by English Heritage) (Clark, 1999b), mechanism to achieve consensus (Kerr, 2000). In addition, conservation plan is a holistic view of the development of the place, site or building encompassing a

variety of disciplines; archaeology, architectural history, landscape history, ecology, science and technology and the social perspective (Clark, 2000).

Historic Scotland (1998), claims that “Conservation plan did not harm the special interest of the listed building and provided a huge opportunity as well as guidance for any legal dispute in conservation” (Historic Scotland, 1998, p. 66). Conservation plan identifies the opportunities for building development (Cambridge Architectural Research Limited, 1999) and provides feedbacks from stakeholders before any conservation work commences (Victoria Baths Trust, 2003). In addition, conservation plan is able to address sustainable development as it pointed out buildings future threats, vulnerability, issues and concerns (Worthing and Bond, 2008).

In the opinion of the author, the above statements, however, are emphatically made by professionals who are directly involved in the management and maintenance of historic buildings (see example from Forster and Kayan, 2009). Therefore, there is the element of biased judgement and strong preference on conservation plan’s advantages. This leads to a question: “Is there any contradicting views or significant concern raised particularly on the deficiencies of conservation plan and its influence in the historic building conservation, particularly in building control administration perspective?”

6. Deficiencies of Conservation Plan

From previous discussion, conservation plan has gained recognition from the majority of building conservation professionals due to its theoretical advantages. While evaluating this recognition, it leads to some major questions, “is conservation plan workable without any deficiencies or completely perfect, particularly in building control administration?” In fact, deficiencies of conservation plan have also been consistently under close scrutiny. Since being promoted in UK, Miele (2005) strongly claims that there is no research to ascertain the workability of conservation plan, as he said: “Conservation plan has been promoted in the United Kingdom for more than a decade, but there is to date no research to establish whether they are working as intended” (Miele, 2005, p. 23). Despite establishment of ‘conservation management plan’ (CMP) of Section 97 of National Heritage Act 2005 (Act 645) (Kayan, 2006) and ‘conservation framework’ (see Ahmad, 2006) in Malaysian context, the practicality of its approach is prone to cynical views from academic sectors and industry alike.

Conservation plan adoption may face various constraints as it is too prescriptive, particularly in its components, structures and processes. Conservation plan should specifically describe the scope, intensity, circumstances, issues and details of the conservation work (such as building conservation works coordination) required (Kerr, 2000; Worthing and Gwilliams, 2002). Conservation plan which is too complex however, may no longer be appropriate for adoption because a wide range of skills is required in its implementation.

With regard to the skills needed to implement a conservation plan, there is the question of who should prepare them and the criteria in the selection of the right person. A study by Preston (2006) in '*Journal of Architectural Conservation, Special Issue*' finds that “legislation is only able to work well when the necessary skills exist” (Preston 2006, p. 35). But, there is a lack of expertise (Preston, 2006) and a disappointing number of professionals (Historic Scotland, 2008) in this area. Skills needed to write conservation plan may vary as it is very much determined by “characteristic and complexity” of sites (Wise, 1993, p. 229). In practice, the writing team preparing conservation plan should reflect on the details and qualities of the building, place or site and their maintenance needs. Yet, this leads to the question: “is a good writing team always available for conservation plan preparation” and “whether or not they are in-house team or a group of consultants or practitioners who will put holistic building conservation approach above all other needs”?

At its best, the conservation plan preparation processes should be a creative integration of efforts and skills by both client and practitioner. Marquis-Kyle (1998) said in '*Study of the East Brisbane State School, Queensland, Australia*', that conservation plan needs a thorough process in its preparation (Marquis-Kyle, 1998). While in Preston’s opinion, the setback is that, there are stages and procedures to be followed (Preston, 2006). During the stage of writing a conservation plan, Horne (1993) suggests that it is essential to engage consultants who have a wide “broadened knowledge” (Horne, 1993, p. 375), equipped with “skills and motivation to engage” (Worthing and Bond, 2008, p. 114) and possessed good “coordination ability” (Weaver, 1995, p. 30; Dreher and Steel, 1996: 53).

Regarding conservation plan preparation, Wood (1999) suggests that a team-based approach should be adopted (Wood, 1999). In line with these opinions, the more “viewpoints” (Drury, 1999) and “cast of fresh eye” (Clark, 1999a) included, the higher the possibility of achieving the desired result of conservation plan. But, Worthing and Gwilliams (2002) argues that the more disciplines and people involved however, the more difficult for a coherent conservation plans to evolve (Worthing and Gwilliams, 2002). Based on the above statements, it can be concluded

that there is no clear indication on how to ascertain whether a team or an individual efforts can achieve the best end results of conservation plan. Therefore, the influence of the end results of conservation plan on historic buildings conservation from building control administration perspective is difficult to determine.

Despite the logic behind the establishment of conservation plan (at least methodologically), however, there is anecdotal evidence suggesting that it has not been comprehensively implemented. John (2007b) asserts that the UK government has defined the role of conservation plan in statutory regulations back in 2004 (John 2007b). But, Miele (2005) argues that “Unfortunately, the role of conservation plan may not, of course, being actually adopted and materialized to this day” (Miele, 2005, p. 23). Clark (1999a) asserts that “Conservation plan is easy to fall into bad practice...there is room for abuse if the related parties fail to manage the process” (Clark, 1999a, p. 37). When the relevant parties are unable to manage the implementation of conservation plan (Forster and Kayan, 2009, p. 214), it can cause historic buildings be left to dereliction or subjected to controversy (example from Adam Smith’s Edinburgh home) (Ferguson, 2011a & 2011b). Conservation plan might also become a money-spinning exercise (Inskip, 1999; Forster and Kayan, 2009), undermined by heritage sectors and exploited by the clients (example of Skye Castle Ross) (Ross, 2004).

As the application for building conservation grants using conservation plan is consistently facing stiff competition, it is arguable that it may not be ethically and inclusively implemented. In the case of English Heritage, nearly £33 million per annum has been expended on grants over the past five years which spread over 800-900 offers per year (depending on demands and projects financial commitment) (English Heritage, 2011). To date, HLF has handed over £1.5 billion to conserve 12,800 historic buildings and £305 million for religious buildings and monuments in UK (HLF, 2011a). By and large however, HLF’s funds are always overwhelmed by grant applications (HLF 2011b). In the author’s opinion, conservation plan may merely be produced to fulfil the satisfaction of grant funding requirements rather than be used as a decisive tool for maintaining heritage properties, including historic buildings.

To date, however, there is a lack of understanding, support and negative perception towards building conservation itself. Hubbard (1993) claims that “there is still very little certain knowledge of people’s conscious or unconscious commitment to buildings from the past...as such, conservation remains shackled by the stigma of subjectivity and accusation of elitism (Hubbard, 1993). Conservation plan considered as “didactic process” (Worthing and Bond, 2008, p. 71), with “considerable amount of gaps” (Pendlebury and Townshend, 1997, p. 9) and has “no ability to check maintenance works” (Forster and Kayan, 2009, p. 214). Professionals working within legislation are guided by their own philosophy and they are rarely involved in seeking people’s view (Mansfield, 2004), ignored community perceptions (e.g. Hendry, 1993; Moore, 1993; Turnpenny, 2004) and perceived merely as a developer’s charter (Worthing and Gwilliams, 2002). From the above statements, a great number of parties in historic buildings maintenance believed that conservation plan is exclusive for certain sectors and not comprehensively applicable to all groups alike.

As stated by English Heritage and the Department of the Environment and Department of National Heritage in Larkham (2000), it is widely accepted that the success of any conservation policy is a result of strong support (e.g. Maguire, 1997; Taylor, 1997, p. 78; Clark, 2000; Kayan and Zuraini, 2003, p. 42; Dann and Wood, 2004, p. 138; Kayan, 2006, p. 41; Orbaşlı, 2008), active attention (Watt, 1999, p. 225; Earl, 2003; Mansfield, 2004; Chung, 2005) and a high level of awareness (Rodwell 2007, p. 88; Forsyth, 2008) of the public at large. Pendlebury and Townshend reports as reviewed by Johns, warns that “...communities and individuals will continue to need to take a leading role” (Johns, 2007b, p. 144). Rodwell (2007, p. 14) argues that “If there is any deficiency in public support, therefore, linkage and strategic roles of conservation seemed to be very loose, unsound and might be missing at some critical points.” Based on the above arguments, there are scepticisms and low level of confidence regarding the practicality of conservation plan by the public at large.

A considerable number of past authors have suggested that the use of conservation plan has contributed to unnecessary constraints, particularly for historic building protection. Implementation of conservation plan by local government is firmly based on the “stick rather than carrot” (Taylor, 2004) and only able to be seen as a “punishment rather than a beneficial process” (Historic Scotland, 1998). From these statements, heritage organisations have been penalised for their inability to conform with conservation plan. This may have sent a wrong message that conservation plan is an instrument of ‘punishment’ and ‘pressure’ rather than a tool that provides maintenance solutions and reference for building control administration decision for historic buildings.

Maguire (1997) and Earl (2003) claim that heritage organisations are often under political pressure (Maguire, 1997, p. 17; Earl, 2003, p. 47). Kerr (2000) suggests that conservation plan should be implemented away from

extraneous pressures (Kerr, 2000). Efforts to express its benefits for historic buildings conservation are essentially paramount. But, it should be allowed to evolve in an independent manner.

There are efforts between related parties in the conservation of historic buildings conservation to the implementation of conservation plan in historic buildings. But, their success in the legal context is still very much questionable as there is “loophole” (English Heritage, 2008), “poor” (Dann, Worthing and Bond, 1999, p. 147), “inherent” (Fairclough, 1999, p. 127) enhancement of its principles. In agreement with the statement, Johnson (1999), points out that, “it takes far too long for grant provider to realise why Conservation Plan is needed” (Johnson, 1999, p. 21). Clark (2000) claims that some practitioners in building conservation industry are still unclear about conservation plan terminology (Clark, 2000). Conservation bodies and authorities are, more often than not, able to work collaboratively in implementing conservation plan (Larkham and Jones, 1993, p. 395; Kayan, 2005, p.15; Shacklock, 2006, p. 7). As evidence, English Heritage’s views on planning applications for new development are always in conflict with the opinions of local planning authorities (e.g. Mansfield, 2004). In addition, Miele (2005) claims that few conservation plan summary shows any understanding of the statutory planning process and the status of the plan in development control or statutory policy (Miele, 2005). In the author’s point of view, legal support and enforcement of conservation plan in historic buildings conservation, particularly in building administration perspective is insufficient.

From the previous discussion, the extent of the influence of deficiencies in conservation plan remains unclear and difficult to determine. It can be said that, there is a strong stand on the need to understand the strategic roles that can be played by conservation plan in historic building conservation with regards to building control administration, particularly in the legislative context.

7. Conservation Legislation and Its Influence on Conservation Plan

Various documents recognised the importance of conservation plan in protecting building’s or place’s significance in legislation in a very specific manner. ‘*Building in Context: New Development in Historic Areas*’ (by English Heritage and the Commission for Architecture and the Built Environment (CABE), Johns, 2007b), ‘*Summaries of Importance*’ (by Department for Culture, Media and Sport (DCMS) (Department for Culture, Media and Sport, 2004) and adoption of Scotland’s ‘*Conservation Plans: A Guide to the Preparation of Conservation Plans*’ in Scotland (Johns, 2007a) have supported the structures, consultation process, implementation, distribution, and presentation of conservation plan. In addition, from April 2005 onwards, each new designation of buildings, sites or places for conservation in UK is required to have conservation plan (e.g. Johns, 2007b).

There is a varying degree of results in the enforcement of legislation and its influence on focus and consistency of conservation plan. Previously, conservation plan focused more on buildings that were likely to fall out of use (schools, hospitals, town hall and etc.) and properties listed in Buildings at Risk Register (used by English Heritage and Heritage Lottery Fund) (English Heritage, 1992; Atkins 1999). On behalf of the conservation grants providers, Clark (2000) asserts that conservation plan needs to demonstrate the consistency. Consistency of legislation that supports conservation plan however, is very difficult to be determined as there is no comprehensive procedures and protocols to check their practicality. Pam Alexander, Chief Executive of English Heritage, as cited by Worthing and Gwilliams (2002) said that:

“Management of historic environment has to be done with great sensitivity, and in a sustainable way, to meet today’s needs without compromising the ability of future generations to meet theirs. This will only be possible with widespread support and understanding. However, “legislation alone, even with funding support to support it, would not be sufficient.” (Worthing and Gwilliams, 2002, p. 564).

In the present situation, conservation plan seems well- accepted is being promoted in the legislative context by the involvement of a wide-range of conservation organisations. But, it is clear that there are contradicting views regarding the implementation of conservation plan. Therefore, in the opinion of the author, the rationale for the implementation of conservation plan will only be holistically justified by focusing on all types of heritage properties. All sorts of relevant contexts (including building control administration), forms and consistency need to be considered inclusively by conservation plan, particularly in the historic buildings conservation.

8. Conservation Plan for Historic Buildings from Building Control Administration Perspective

Conservation plan plays a crucial role to pull all the building conservation issues together in a balanced way. With regard to historic buildings maintenance, conservation plan provides a good approach, protection, legislative control (Yeomans, 2007), promotes active involvement (Fairclough and Taylor, 2001), contributes resolutions (Drury, 1999; Worthing and Bond, 2008), enhances the cultural significance (Kerr, 2000; Worthing and Dann, 2008) and enlightens the clarity of historic buildings (Simpson, 1999).

However, other professionals in the industry suggested that there is a need to develop conservation plan in a more comprehensive, vigorous and robust manner. Miele (2005) argues that: "...Conservation plan succeeds not because the statement of significance or policy section is well worded (although this helps); the critical factor has in every case been whether or not the plan shows an awareness of the wider development process affecting the site" (Miele, 2005, p. 25). Wood (1999) highlights that, "the promoters of conservation plan should seek to introduce greater flexibility into their conceptual model, addressing the different circumstances commissioned by the different types of clients" (Wood, 1999, p. 83).

On the other hand, Miele (2005) points out that "...there is no technical planning reason why an authority could not give conservation plans some status, encouraging or even requiring them in respect of certain sites or areas...and to allow for the possibility of conservation plan in certain circumstances" (Miele, 2005, p. 32). Considering the above statements, it is clear that an opportunity exists now to give conservation plan a stronger statutory basis tailored to suit local/national building conservation needs and context, particularly in the conservation of historic buildings.

Clarks (1999b) strongly believed that conservation plan seems able to avoid various layers of legislative system-bureaucratic policies (Clark, 1999b). However, Miele (2005) raises his concern on overlapping issues as he points out:

"One could argue that local planning policies which reproduce accepted guidance and principles are superfluous and should not be repeated in conservation plans...therefore, evidence-based analysis is essential to the effectiveness of conservation plans" (Miele, 2005, p. 25).

Therefore, if conservation plan is really good and practical in the building conservation industry, then more than a simple semantic shift is needed. This includes evidence-based analysis on its implementation, particularly in historic building conservation approach, particularly in building control administration context. For instance, relevant building control scopes of works that inclusive in the context include scrutiny of building plans (e.g. issuance of historic building's plan approval on conservation works). In addition, enforcement of legislative (e.g. plan checking by referring to related law such as upgrading and refurbishment works and etc.), building works inspection (e.g. pre, during and post conservation such as issuance declaration of inspection), building upgrading, refurbishment and adaptive re-use consultation (e.g. new use of buildings-BOMBA Requirements), building conservation coordination (e.g. restoration, refurbishment, preservation and adaptive re-use projects).

Conservation plan can act as a "bridge" for all the expertise involved in the protection of heritage properties. But, in reality, this is not seen as a common practice. In enhancing the workability and values of conservation plan however, contributions of other professionals may be overlooked. Worthing and Gwilliams (2002) quoted:

"The National Trust has admitted as it has not always happened in practice. The National Trust has placed particular emphasis on surveys which reflect specialist views of archaeologists, nature conservationists, and architectural historians. Yet, it has tended to place less emphasis on local people's judgments of what is significant and must now consider how to restore the balance" (Worthing & Gwilliams, 2002, p. 20).

The question is, apart from owners and occupiers who should be consulted in developing a conservation plan? Glover (2003) articulates that building surveyors' expertise is required to enhance the value of conservation plan as they possessed the competency necessary in producing maintenance schedule, conducting dilapidation survey and preparing building repair works proposal (Glover, 2003). Ideally, in the opinion of the author, conservation plan should be prepared by a wide and balanced range of experts. It should also be prepared without heavily relies on the influence of certain expertise.

It is also important for the people who are commissioned to carry out conservation plan to show their awareness on relevant influencing factors and needs. As highlighted, conservation plan is affected by relevant factors such as building's information and conservation policies (see for example, Christchurch City Council, 2004), therefore, they are likely to be implemented with more integrity and competently (Clark, 1999b) using a rigorous approach yet in a transparent way (Worthing and Bond, 2008). According to Worthing and Bond (2008):

"three categories of stakeholders who need to be consulted and actively involved including interested parties who might be affected or might have an impact on conservation plans delivery and individuals and groups that may have evidence in significance establishment. Individuals or groups involved and have memories and insight into the place should also be consulted as well". (Worthing & Bond, 2008, p. 20).

It is clear that conservation plan should not be confidential to those who share the common grounds, issues and benefits from their heritage properties such as the stakeholders and public at large.

Conservation plan can be seen as a driver that contributes to a sustainable historic environment. Clark (1999a) suggests that implementation of conservation plan is another aspects of achieving sustainability (Clark, 1999a). English Heritage echoed that conservation plan achieves a good understanding and set a high level of appreciation of the historic environment values, forces of change and resources (English Heritage, 1992 and 1997). Apparently, when a conservation plan provides guidelines to achieve a balance either in cultural, aesthetic, economic and etc. for historic buildings (including building control administration aspect), only then sustainable historic environment is likely to be achieved (see example from Forster, et al., 2011). This is essential to the emergence and virtues of conservation plan particularly in maintaining and protecting the cultural significance of historic buildings.

9. Conclusion

Conservation plan can be seen as a rigorous tool to comprehensively understand building, place or site and making informed historic building conservation decision and approach. Despite promotion and recognition, conservation plan often mitigates against its implementation for historic buildings conservation and building control administration context, at international arena (including in Malaysia). More importantly however, a holistic conservation approach for historic buildings supported by conservation plan will contribute to a sustainable historic environment. This novel concept will be pursued in achieving sustainable historic building conservation.

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