A Guide to Working with

The Federal Heritage Buildings Review Office
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Cover page illustration: Library of Parliament, Ottawa, Ontario; drawing by Lyette Fortin, Architect

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Preface

The Federal Heritage Buildings Review Office’s (FHBRO) goal in publishing this guide is to explain to custodian departments the nature of their heritage obligations under the Treasury Board Policy on Management of Real Property, as well as the processes administered by FHBRO to help to ensure compliance.

Until 2006, real property heritage obligations were defined under the Treasury Board Heritage Buildings Policy, approved by Cabinet in April 1982. On 1 November 2006, that policy was rescinded and its requirements incorporated within the new Treasury Board Policy on Management of Real Property, which brought together federal real property obligations, previously contained in thirteen separate policies, in a single document. This policy is a key component of a broader Treasury Board policy renewal strategy, whose goals are to rationalize and consolidate policies and clarify the responsibilities and accountabilities of departments and deputy heads.

The adoption by Parks Canada of the Standards and Guidelines for the Conservation of Historic Places in Canada in 2003 is another significant recent development. The first pan-Canadian conservation manual, it replaced the FHBRO Code of Practice, which since its publication in 1996, had been the key reference for custodian departments on all issues concerning the conservation of federal heritage buildings.

This guide was prepared by present and former members of the FHBRO team, notably Lynda Villeneuve, who prepared the first draft, Christiane Lefebvre, who was responsible for the final text and for coordinating its publication, and Gwénaëlle Le Parlouër. The guide also benefited from the comments and suggestions of several of our federal colleagues, whose help and collaboration was greatly appreciated.

We hope that this guide provides answers to the various questions that custodian departments may have about their heritage obligations, and that it will help to facilitate the preservation of our federal heritage buildings for present and future generations.
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Introduction

The Government of Canada’s Objective is to Preserve Its Built Heritage

Federal built heritage comprises the places, buildings and monuments that have been recognized as having heritage value. This built heritage includes, among other things, complexes, forts, cultural landscapes, canals and historic districts. As of 2009, there are approximately 1,300 federal heritage buildings and 216 federally-owned national historic sites.

The designation of federal heritage buildings is carried out under the authority of the Treasury Board Policy on Management of Real Property. An interdepartmental, multi-disciplinary advisory committee evaluates the heritage value of these buildings on the basis of their historical, architectural and environmental significance, and makes recommendations to the Minister of the Environment regarding their designation, if deemed to have heritage significance. Buildings may be designated as either “Classified” (the highest level) or “Recognized” federal heritage buildings.

National historic sites have a separate designation process under the Historic Sites and Monuments Act. A national historic site may be an archaeological site, structure, building, group of buildings, district or cultural landscape that is of national historical significance. They may also include Classified and Recognized federal heritage buildings.

Federal built heritage includes buildings and places that recall the lives and history of the men and women who built this country. They are significant to all Canadians, be they young or old, recent arrivals to Canada or long-time residents.

Built heritage raises our awareness about how Canadian society has developed, helps us better understand the present and prepare for the future. It fosters a sense of belonging and helps our communities to flourish.
The Treasury Board Policy on Management of Real Property places protection of the heritage character of federal buildings on an equal footing with other considerations related to real property management and it is within this policy that departmental obligations and responsibilities are defined.

The Treasury Board policy stipulates that departments must manage the buildings they administer so as to conserve their heritage character throughout their lifecycle. It also contains statements regarding the protection of the heritage character of federal buildings in the context of their acquisition, use and disposal, and actions that could affect their heritage character.

BACKGROUND

In 2006, the Treasury Board Policy on Management of Real Property replaced the Treasury Board Heritage Buildings Policy, which had been approved by Cabinet in April 1982. This policy resulted from the federal government’s commitment to protect the heritage character of its inventory. It was introduced following a Cabinet recommendation to introduce measures designed to encourage the preservation of heritage buildings in Canada, including the formulation of a specific policy on federal heritage buildings. The Federal Heritage Buildings Review Office (FHBRO) was established at that time, with the specific mandate to help departments preserve their heritage buildings, in accordance with the policy.

Departmental heritage obligations have remained essentially unchanged since 1982, with the exception of the introduction of additional guidelines in 1998 regarding the disposal of federal heritage buildings. Over time, however, these obligations have been incorporated into a number of federal real property management tools issued by Treasury Board, making the preservation of the heritage character of federal buildings one of the essential requirements of this management framework. Key milestones have included the issuing of the Treasury Board Circular extending the application of the heritage policy to all federal departments (1987); the inclusion of the policy in the Treasury Board Real Property Administration Manual (1991); and the full integration of these obligations into the new real property management policy (2006).

Cape Spear Lighttower, National Historic Site of Canada
St. John’s, Newfoundland and Labrador
© Parks Canada; E. Walsh, 2004

Built in 1835, the Cape Spear Lighttower is designated Classified, because of its historical association and architectural and environmental value. The lighttower is associated with the provision of aids to navigation for the settlement of Newfoundland. It is also considered to be an excellent example of the Neoclassical style, and is characterized by its well-proportioned composition, simple form and cubic volume. Well built and functionally well conceived, it reinforces its maritime setting of rugged headland and natural coastline.

1 The Treasury Board Policy on Management of Real Property can be found at www.tbs-sct.gc.ca. Relevant sections are provided in Appendix I of this Manual. The Guide to the Management of Real Property provides additional information and advice on complying with the policy. It can be found at www.tbs-sct.gc.ca. Relevant sections are provided in Appendix II.

2 The government bodies that fall under this policy are those that meet the definition of “department” under the Financial Administration Act (s. 2). Crown corporations do not fall under the policy. It applies only to real property owned by the federal Crown; leased properties or properties under licence are not included.
MINISTER OF THE ENVIRONMENT

The role of the Minister responsible for Parks Canada, the Minister of the Environment, is to approve the designation of federal heritage buildings on the recommendation of the Federal Heritage Buildings Committee (FHBC).

The Minister of the Environment also designates Canada’s national historic sites.

CUSTODIAN DEPARTMENTS

Departments are responsible for managing the real property under their administration in accordance with their mandate and operational objectives, while preserving the heritage character of designated buildings – whether Classified or Recognized – throughout their lifecycle. This means that departments must incorporate heritage considerations into their real property management framework in order to ensure informed decision-making. Heritage considerations must also be factored into their accountability frameworks, decision-making structures and the systems used for performance reporting.

More specifically, in order to comply with the policy, departments must:

**Have FHBRO evaluate buildings that are 40 years of age or older, and that are under their administration or that they wish to acquire, in order to determine their heritage character.**

The evaluation of a building’s heritage character is essential to ensuring that its value is respected and preserved. Heritage character may be understood to be the combination of a building’s heritage value and its character-defining elements, which are the features of the building that must be protected in order to preserve its value. In some instances, a building’s value will be linked primarily to its history, whereas in other cases, it will relate to its architectural and environmental qualities. The purpose of an evaluation is to determine where the heritage value of federal buildings lies. It also makes it possible to determine whether a building should be designated as Classified or Recognized, or not designated.

**Respect and conserve the heritage character of federal buildings under their administration throughout their lifecycle.**

**Consult FHBRO before undertaking any intervention that could alter the heritage character of a classified federal building.**

**Obtain appropriate conservation advice before undertaking an intervention that could alter the heritage character of a recognized federal building.**

Preserving the heritage character of federal heritage buildings is of great importance, since these buildings provide tangible evidence of our history. For this reason, it is essential that custodian departments establish appropriate management practices and take into account the heritage character of federal heritage buildings when planning interventions.

**Consult FHBRO before demolishing, dismantling or selling a federal heritage building.**

The policy requires that best efforts be made to arrange for appropriate alternative uses of under-utilized or excess heritage buildings, first within the federal government and then outside the federal government.

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3 Treasury Board Policy on Management of Real Property, s. 6.1.9.
4 For more information about departmental obligations related to heritage evaluation, see pages 7–14.
5 Treasury Board Policy on Management of Real Property, s. 6.1.9 and 6.1.10.
6 For further information about departmental obligations with respect to interventions to designated buildings, see pages 15–20.
7 Treasury Board Policy on Management of Real Property, s. 6.1.10.
8 For more information about departmental obligations with respect to disposals, see pages 21–24. Other advice is provided in the new Directive on the Sale or Transfer of Surplus Real Property, which may be found at www.tbs-sct.gc.ca.
PARKS CANADA AGENCY

The role of Parks Canada with respect to the conservation of built heritage is to establish national goals to protect federal heritage buildings and national historic sites, as well as to develop policies, standards and guidelines, in consultation with other federal departments and agencies. This role is set out in the Parks Canada Agency Act.9 The Treasury Board Policy on Management of Real Property recognizes Parks Canada’s authority in this area.10

Parks Canada is responsible for the Historic Sites and Monuments Board of Canada (HSMBC), the board that recommends national historic site designations to the Minister. Parks Canada’s responsibilities also include the conservation of national parks, national marine conservation areas and national historic sites under its jurisdiction.

The Agency is responsible for the protection of all buildings and other works located on its land (including Classified and Recognized federal heritage buildings). However, this responsibility does not include national historic sites that are administered by other departments or agencies, although the Agency may provide them with advice and guidance about conserving the heritage value of these sites, on request.

Parks Canada also sits on the Strategic Disposals Committee, chaired by the Treasury Board Secretariat, as well as the Assistant Deputy Minister’s committee on strategic disposals. Its role is to ensure that all strategic disposals take into account the protection of designated buildings and sites, and that best efforts have been made to ensure that protection is in place when they leave the federal inventory.

9 The Parks Canada Agency Act may be found at www.pc.gc.ca
10 Treasury Board Policy on Management of Real Property, s. 8.11.
FEDERAL HERITAGE BUILDINGS REVIEW OFFICE (FHBRO)

The Federal Heritage Buildings Review Office’s (FHBRO) principal role is to advise custodian departments on how to meet their heritage obligations under the Treasury Board Policy on Management of Real Property. The office is located within Parks Canada because of the Agency’s mandate to protect the natural and cultural heritage of our special places.

FHBRO manages various processes that are defined under the policy, including the heritage evaluation of federal buildings, the review of proposed interventions to Classified buildings and the review of proposed disposals. It also provides conservation advice regarding designated buildings. Lastly, FHBRO provides training on the heritage obligations under the Treasury Board Policy on Management of Real Property.

The FHBRO team consists of a Manager, a Registrar and a Policy Analyst. FHBRO also works in close collaboration with specialists from Parks Canada’s Historical Services Branch and Public Works and Government Services Canada’s Heritage Conservation Directorate (PWGSC–HCD).

To ensure proper communication and collaboration between FHBRO and custodian departments, each department appoints a FHBRO representative, whose role may vary depending on their respective needs. Some FHBRO representatives serve only as a point of contact, whereas others coordinate all departmental consultations with FHBRO.

THE FEDERAL HERITAGE BUILDINGS COMMITTEE

The Federal Heritage Buildings Committee (FHBC) is an interdepartmental and multidisciplinary advisory committee, which provides expert advice on issues concerning the conservation of federal heritage buildings. It is chaired by the Manager of FHBRO.

The FHBC evaluates the heritage character of federal buildings 40 years of age or older. It may also be asked to provide recommendations on proposed interventions that could have a significant impact on the heritage character of federal heritage buildings. FHBC decisions and recommendations are reached by consensus.

The FHBC’s multidisciplinary approach to conservation is ensured through the varied backgrounds of its members. Having representatives from the custodian department on the committee also ensures that the “owner’s” point of view is taken into account in all discussions.

Ardgowan House, National Historic Site of Canada
Parkdale, Prince Edward Island
© Parks Canada; J. Butterill, 1995
Ardgowan House was built circa 1850–54. It is designated Recognized because of its association with the process by which the British colonies united to form the Dominion of Canada, and with William Henry Pope (1854–1873), one of the Fathers of Confederation. Its country-villa design is based on the ideas of American landscape architect Andrew Jackson Downing. Ardgowan House is a well-known regional landmark.
The composition of the FHBC is as follows:

- the Manager of FHBRO (committee chair);
- an historian;
- an architectural historian;
- a conservation architect, conservation landscape architect and/or conservation engineer;\textsuperscript{11}
- up to three representatives from the custodian department;
- for federal buildings located in the National Capital Region, up to three representatives from the National Capital Commission.

Occasionally, depending on the specific nature of the project under review, other experts may be asked to sit on the committee. The FHBC may also have a representative from Treasury Board if the matter to be considered relates to the application of the *Policy on Management of Real Property*.

\textsuperscript{11} This may vary depending on the type of building or intervention under review.
**CUSTODIAN DEPARTMENT OBLIGATIONS**

The *Treasury Board Policy on Management of Real Property* states that departments must have FHBRO evaluate the buildings they administer or that they are planning to purchase that are 40 years of age or older, in order to determine their heritage character.\(^{12}\)

In order to comply with this section of the policy, departments must submit all federal buildings that meet the “40 years of age or older” rule for heritage evaluation; departments may, however, make special evaluation requests for buildings that are less than 40 years old.\(^{13}\) It should be noted that this obligation does not extend to buildings administered by Crown corporations (e.g. Canada Post Corporation), archaeological resources or ruins.

Canada’s national historic sites are not, themselves, subject to this obligation; however, all buildings located on national historic sites that belong to the federal government must be submitted to FHBRO for evaluation.

If interventions are planned, it is very important to submit request for the evaluation of the affected buildings at the very beginning of the initial phase of the project.

The integrity of the evaluation process is ensured through the use of evaluation criteria that are recognized both nationally and internationally, in-depth research and an evaluation committee made up of experts from various disciplines, as well as representatives from the custodian department. The evaluation criteria used by FHBRO are based on a system developed by architectural historian, Dr. Harold Kalman, for Parks Canada and described in *The Evaluation of Historic Buildings*, published in 1980. The factors evaluated by FHBRO and their weighting have been fine-tuned over time and adjusted to take into account the federal context.\(^{14}\)

The purpose of the evaluation is to determine the heritage character of federal buildings, as well as their level of designation, either Classified, Recognized or not designated. In order to meet this policy requirement, departments should establish an evaluation plan that takes into account acquisitions, operations, maintenance and disposals. The real property inventory systems used by departments should enable them to readily identify buildings that require an evaluation.

Departments are encouraged to work with FHBRO to develop guidelines and annual plans that will help them determine the order in which their requests for evaluations should be submitted.

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\(^{12}\) *Treasury Board Policy on Management of Real Property*, s. 6.1.9.

\(^{13}\) The 40-year point provides a degree of perspective on the building’s history; it is also a stage in a building’s life cycle at which significant reinvestment decisions must often be made.

The heritage character of federal buildings is evaluated on the basis of the following factors:\(^\text{15}\):

- Historical associations—thematic association, person/event and local development
- Architecture—aesthetic design, functional design, craftsmanship and materials, designer
- Environment—site, setting and landmark status.

To be designated a Classified federal heritage building, the highest level of designation reserved for the best examples of federal built heritage, a score of between 75 and 135 points (out of a total of 135) must be obtained.

For a building to be designated as a Recognized federal heritage building, the second level of designation for buildings that have significant heritage value, a score of between 50 and 74 points is required.

A building will not be designated if it scores below 50 points. There are no specific heritage obligations for these buildings, however, some of them may have specific significance to communities or interest groups, and these interests should always be taken into account in decision-making.

Federal real property should be submitted to FHBRO for a heritage evaluation when it meets the following three conditions:

- it is 40 years of age or older;
- it is owned, or is being considered for purchase, by a federal department;
- it meets the definition of “building”, based on the following three criteria:
  1. it is capable of containing or sheltering human activities
  2. it has an interior space, an exterior shell and a roof
  3. and it is fixed in a permanent specific location

The ruins of Thomas “Carbide” Wilson’s phosphate fertilizer plant
Gatineau Park, Quebec
© C. Lefebvre, 2008
This structure has no roof and is therefore not considered to be a building.

Main Greenhouse Range (Building 50)
Central Experimental Farm, National Historic Site of Canada,
Ottawa, Ontario
© C. Lefebvre, 2008
These greenhouses are considered to be buildings, since they accommodate research activities, have walls and a roof and are fixed in a specific location.

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\(^\text{15}\) See evaluation criteria, rating system and explanatory notes in Appendix III.
STEPS IN THE PROCESS

FHBRO administers the heritage evaluation process, in accordance with the Policy on Management of Real Property and the guidelines set out in the Guide to the Management of Real Property.

The evaluation process consists of the following steps:

1. Submission of a request for an evaluation
2. Determination of the type of evaluation required
3. Drafting of a research report (if necessary)
4. Evaluation meeting
5. Recommendation for designation

DOCUMENTS TO BE PROVIDED WITH A REQUEST FOR AN EVALUATION

An introductory letter explaining the context for the evaluation request, for example, whether an intervention (alteration, disposal or demolition) to the building is planned, together with a schedule for the intervention, is required so that FHBRO can determine evaluation priorities.

A Preliminary Information Sheet must be completed for each building submitted, including secondary buildings. This form asks for essential information about the building and its history, and it is very important that it be completed as accurately as possible. It is especially important to provide good recent photographs of the building, plans and any other available information (historical report, report on building condition, etc.).

Alexander Graham Bell Museum, National Historic Site of Canada
Baddeck, Nova Scotia
© Parks Canada; J. Steeves, 1981

The Alexander Graham Bell Museum, built in 1954–56, is designated Recognized. Built specifically to hold Alexander Graham Bell artifacts, the museum consists of an attractive A-frame structure and a large column-free interior space. The rock-faced sandstone exterior walls, patterned, coloured slate flooring, laminated wood beams at the roof and redwood fittings and furnishings give the building’s modern design its rustic character.
**Determination of the type of evaluation required**

FHBRO uses one of three evaluation methods, depending on the nature of the building submitted. It is FHBRO’s responsibility to determine which of these methods is most appropriate for the building.

**Formal evaluation** is used for buildings that may potentially be designated as federal heritage buildings. This type of evaluation requires the preparation of a research report and an evaluation meeting involving the full FHBC. Nine to twelve months are required to complete this type of evaluation, given the research and analysis that must be completed prior to the evaluation meeting. FHBRO therefore recommends submitting evaluation applications at least twelve months in advance of the date when the result is required.

**Benchmark evaluation** is used for buildings that are likely to score close to 50 points, which is what is required for a designation. This type of evaluation requires the preparation of a short research report that includes comparative examples. A score is proposed to the custodian department by an evaluation sub-committee consisting of an historian and a conservation architect. The custodian department has one month to either accept the proposed score or challenge it, in which case it may ask for a formal re-evaluation of the building. The benchmark evaluation process takes up to nine months to complete.

**Screening** is used for buildings that appear not to merit designation, on the basis of having little or no chance of receiving a final score greater than 49 points. This type of evaluation is performed by a sub-committee that includes the FHBRO Manager, an historian and a conservation architect, using documentation submitted by the federal department or agency. No additional research is carried out. This review may take up to four months to complete. The custodian department may comment on, or suggest modifications to the score recommended by FHBRO. It may also request a benchmark or even a formal re-evaluation.

**Preparation of a research report**

For formal and benchmark evaluations, a research report must be prepared to serve as a reference document during the evaluation. Parks Canada’s Historical Services Branch prepares the research reports.

The custodian department may help Parks Canada’s historians by making available all of its documentation about the history of the building being evaluated. The types of information used by historians include historical and recent plans; photographs from different time periods; written documents; and statements from members of the community where the building is located. Where possible, the historian may visit the building being evaluated.

*Government of Canada Building*

*Grand Falls, New Brunswick*

© PWGSC, 1999

This Recognized building, constructed in 1958–59, is associated with the expansion of federal government services in the post-Second World War period. It is designed in the modern aesthetic, and is one of the largest federal buildings in the region. The Government of Canada Building reinforces the urban character of the town centre of Grand Falls.
4 Evaluation meeting

In the case of a formal evaluation, FHBRO organizes an evaluation meeting to which the FHBC is invited. The research report is used as a starting point for discussion, but the points of view of all Committee members are taken into account. The custodian department can name up to three representatives to the FHBC. It is highly recommended that at least one of these representatives be familiar with the building under consideration, as well as with the community in which it is located. Departmental observers from regional offices are also sometimes invited to participate at meetings, in particular when environmental criteria are being considered. The meeting is chaired by the Manager of FHBRO, who ensures that all decisions reflect a consensus view.

Once the evaluation has been completed, FHBRO prepares a Building Evaluation Record with the final score for each criterion, the total points obtained and the committee’s designation recommendation: not designated, Recognized or Classified. This is signed by the Manager of FHBRO and constitutes the official result of the evaluation. Once finalized, it is sent to the custodian department. The minutes of the evaluation meeting are also submitted to FHBC members for comments in the weeks following the meeting. These minutes are one of the main sources of information, together with the Building Evaluation Record and the research report, used in the preparation of a Heritage Character Statement, if the building has been recommended for designation.

5 Recommendation for designation

At the end of the evaluation process, some buildings are recommended for designation. It is important to note that the FHBC does not itself designate buildings, but recommends designation to the Minister of the Environment.

A list of proposed designations is submitted to the Minister at the end of each fiscal year for approval. Once such approval has been received from the Minister, the designated buildings are listed on the Register of Government of Canada Heritage Buildings and on the Canadian Register of Historic Places. It is essential that departmental representatives receive training on FHBRO’s evaluation process before participating as evaluators on the FHBC. The Register of Government of Canada Heritage Buildings is available at www.pc.gc.ca. The Canadian Register of Historic Places may be found at www.historicplaces.ca.
THE HERITAGE CHARACTER STATEMENT

The policy requires that departments protect the heritage character of the designated buildings they administer. In order to do this, they must understand and respect this heritage character in all planning and intervention-related activities. The Heritage Character Statement was developed by FHBRO to explain the reasons for the designation and what it is about the building that makes it significant (the heritage character). This statement reflects the results of the evaluation process and is based primarily on the Building Evaluation Record and the minutes of the evaluation meeting. It is a short document of two to three pages that includes the following sections:19

- **General Information** provides users with basic information about the building, including the FHBRO and Directory of Federal Real Property numbers.

- **Description of Historic Place** answers the question: What does the designation apply to, and what does it include? This section describes the designated building in general terms and specifies what is being designated.

- **Heritage Value** answers the question: Why is the building important or significant? This section is directly related to the evaluation criteria.20 It discusses the historical (thematic, person/event, local development), architectural (aesthetic design, functional design, craftsmanship and materials) and environmental (site, settings, landmark) significance of the building identified during the evaluation process.

- **Character-Defining Elements** answers the question: What are the key elements or features of the building that must be protected in order to preserve its heritage value? This section briefly describes the tangible features of the building that carry or express its value or significance. These may include formal elements (volume, elements of its composition, etc.), materials and craftsmanship, spatial configurations, finishes, and ornamental details, among other things.

Each building recommended for designation as a federal heritage building receives a Heritage Character Statement, prepared by FHBRO, which is sent to the custodian department for review and approval before being finalized.21 The final statement is translated and made available in both official languages.

Each designated building has its own Heritage Character Statement, which may be obtained from the departmental FHBRO representative, or from the FHBRO Registrar.

It is important that everyone involved in interventions to federal heritage buildings has access to their Heritage Character Statements. This includes building managers and maintenance staff, occupants or new owners, and any consultants working on proposed interventions.

For Canada’s national historic sites, the Commemorative Integrity Statement plays a role that is equivalent to that played by the Heritage Character Statement for federal heritage buildings: it sets out the reasons for the designation, the values associated with the site, and those elements or characteristics of the site that need to be protected or conserved.

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19 See the example of a Heritage Character Statement provided in Appendix IV. Heritage Character Statements written before 2002 were structured somewhat differently.

20 For a detailed list of criteria, see Appendix III.

21 In rare cases, there is only one Heritage Character Statement for a group of buildings.
FOR THE DEPARTMENTS

The Heritage Character Statement is the best tool available to ensure that the heritage character of the federal heritage buildings they administer is preserved. The Heritage Character Statement can guide the preparation of conservation and maintenance plans, to ensure appropriate stewardship of the building. It can also be used in conjunction with the Standards and Guidelines for the Conservation of Historic Places in Canada to plan interventions in a manner that respects the heritage character of the building.

FOR FHBRO

The Heritage Character Statement is the primary reference document used to carry out a Review of Intervention for a designated building. The Heritage Character Statement allows FHBRO to measure the impact of proposed work on the building’s heritage value and character-defining elements.

Granary, detail of fresco
Manoir Papineau, National Historic Site of Canada
Montebello, Quebec
© C. Lefebvre, 2008

The Granary is directly associated with politician Louis-Joseph Papineau (1786–1871), the first French-Canadian nationalist leader and seigneur of La Petite-Nation, and with Napoléon Bourassa (1827–1916), an architect and painter who used the upper floor studio during the summers of 1858 to 1871. Testimony to the time Napoléon Bourassa spent in the upstairs studio, are the frescoes ornamenting the ceiling.

Federal Building, detail of main entrance
Winnipeg, Manitoba
© C. Lefebvre, 2008

The stepped massing, flat walls and stylized decoration clustered around the entrance and first floor windows are elements that characterize the Federal Building as an example of “Classical Moderne” architecture.

22 For further details about intervention reviews, see the next section.
The Air Terminal Building, constructed in 1960 on the airfield sector of the FOX-M station of the former Distant Early Warning (DEW) Line, is designated Classified. The building is associated with the continental air-defense programs of the Cold War. As part of one of four main stations constructed for the DEW Line, the Air Terminal Building was part of a joint American-Canadian effort to monitor Arctic airspace through an innovative radar and radio system designed to provide advance warning to North American military authorities of a possible air attack from the Soviet Union.

**CHECKLIST**

- ✔ Does the department have an up-to-date inventory of all federal buildings that it administers?
- ✔ Has the department had all buildings 40 years of age or older evaluated?
- ✔ Does the department have in its possession all Heritage Character Statements for its designated buildings (Classified or Recognized)?
- ✔ Has the Heritage Character Statement for each designated building been given to everyone likely to carry out work on these buildings (managers, maintenance staff, occupants, consultants)?
- ✔ Do these people understand the meaning and scope of the Heritage Character Statement? For example, have they taken FHBRO training?
**Intervention Review**

**Custodian Department Obligations**

The Treasury Board Policy on Management of Real Property states that the departments must respect and conserve the heritage character of federal buildings under their administration throughout their lifecycle.\(^{23}\)

Once the evaluation process has been completed and a building has been designated, the custodian department must develop management and planning processes that ensure the protection of its heritage character.

More specifically, the Guide to the Management of Real Property\(^ {24}\) states that departments must:

- Seek FHBRO’s advice before undertaking interventions, including ones related to maintenance or changes of use, to Classified federal heritage buildings that could affect the building’s heritage character, as defined in the Heritage Character Statement.

- For alterations, changes of use or other interventions to Recognized federal heritage buildings that could affect heritage character, departments must obtain appropriate conservation advice. This advice can be obtained from a private or public sector conservation expert, including FHBRO.

**Why Must Departments Consult Conservation Experts?**

Heritage conservation is a field that requires a knowledge of theory (charters, conservation philosophy, and concepts of value and authenticity), technical matters (traditional types of construction and craftsmanship, building pathology, structural systems, etc.) and regulatory frameworks (applicable standards, compensation measures, etc.), among things. Heritage conservation experts will also be familiar with the recommended approaches to preservation, rehabilitation and restoration, as defined by the Standards and Guidelines for the Conservation of Historic Places in Canada.

**Whom Should Departments Consult?**

Qualified heritage conservation professionals, include architectural historians, conservation architects and engineers, landscape architects, and archaeologists. In some instances, it may be necessary to call in professionals who have expertise in specialized areas (for example, seismic engineers), or non-professionals, such as trades people, who specialize in masonry conservation or restoration work (who have expertise, for example, in the restoration of stained-glass or specific interior finishes). Each project has its own specificities that determine which types of experts need to be consulted. As the practice of conservation is not regulated in Canada, it is necessary to seek professionals who have specific training in the appropriate area. In the absence of recognized training, experts should demonstrate that they have worked on similar projects and are recognized by their peers for their conservation expertise.

FHBRO may provide conservation advice to departments that request it, in particular on how to interpret Heritage Character Statements and the Standards and Guidelines, in the context of a proposed intervention. FHBRO may also help departments identify conservation resources, whether within the federal public service or in the private sector.

**When Should the Departments Seek Conservation Advice?**

Conservation expertise can be put to effective use at every stage of a project, from the strategic planning phase through the various design phases (concept design, design development, etc.), up to and during construction. Conservation experts should be involved at the earliest possible stage of project planning.

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\(^{23}\) Treasury Board Policy on Management of Real Property, s. 6.1.9.

\(^{24}\) Guide to the Management of Real Property, s. 6.6.5. The Guide also refers to archaeological resources, which are also heritage resources and should be taken into account when undertaking interventions to federal heritage buildings.
Every year, FHBRO receives a large number of requests from departments for advice and recommendations about interventions to federal heritage buildings. The proposed interventions are extremely varied, ranging from the straightforward repair of character-defining elements, to the partial demolition of a portion of a building. In order to systematize its approach to such requests, FHBRO introduced a process called the Review of Intervention. The purpose of a Review of Intervention is to assess the impact of the proposed intervention on the building’s heritage character and, where appropriate, recommend mitigation measures.  

“An intervention is any action, other than demolition or destruction, that results in a physical change to an element of a historic place.”

Definition from the Standards and Guidelines for the Conservation of Historic Places in Canada.

**STEPS IN THE PROCESS**

The Review of Intervention process includes the following steps:

1. **Submission of a request for a Review of Intervention**
2. **Preparation of the Review of Intervention report**

**Submission of a request for a Review of Intervention**

FHBRO encourages custodian departments to inform it as early as possible of any planned interventions to Classified federal heritage buildings. Initial contact may be made as soon as a project begins to take shape, whether at the planning or concept stage. For complex projects, it may be appropriate to submit a request for a Review of Intervention at each significant stage of the project.

**INFORMATION TO BE INCLUDED WITH A REVIEW OF INTERVENTION REQUEST**

- **Basic information** about the building, such as its name and address.
- **Project contacts.**
- **The purpose of the project,** in the form of a short description of the proposed intervention and the reasons for it (change of use, new operational requirements, upgrades to meet code requirements, correction of a technical problem, etc.) and how the heritage character of the building will be protected.
- **Scope of work,** which should describe the various elements of the project (foundations, exterior, roof, envelope, windows, interior, mechanicals, etc.), and how the affected character-defining elements described in the Heritage Character Statement will be preserved, or what mitigating measures are being considered.
- **Sufficient documentation (photographs and plans)** to enable FHBRO to prepare the Review of Intervention report, whose purpose is to analyze the impact of the planned project on the heritage character of the building. Photographs may be used to illustrate why the work is required (a picture is worth a thousand words). Drawings (plans, elevations, details), as well as specifications, may also be required to clearly explain the work being proposed.

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25 This process is not employed for disposals, which are subject to a separate process – see the next section.
When a request is received, FHBRO determines whether a Review of Intervention report is required.

- If the proposed intervention is minor and unlikely to have a significant impact on the heritage character of the building, a short note is sent to the department (by e-mail) to confirm that it is not necessary for FHBRO to prepare a Review of Intervention report.
- If the work requires a Review of Intervention, FHBRO advises the department.
- If the Review of Intervention request concerns a very prominent federal heritage building, such as a building on Parliament Hill, and the proposed work is likely to have a major impact on its heritage character, FHBRO may decide to conduct a formal review in which the advice and recommendations of the FHBC are sought.

An effective Review of Intervention request will demonstrate that:

- the heritage value and character-defining elements set out in the Heritage Character Statement were taken into consideration in developing the project and, where applicable, that mitigating measures to protect them are planned;
- the approach to the intervention was guided by the Standards and Guidelines for the Conservation of Historic Places in Canada;
- heritage conservation experts were consulted as the project was developed.

The request for a Review of Intervention, together with the required documentation, should be sent by e-mail or regular mail to the FHBRO Registrar. FHBRO then forwards these documents to a reviewer who will prepare the Review of Intervention report. The reviewer may contact the project contact for further details about the project, if required.

Note: Each department should establish an appropriate internal process for the submission of requests for Reviews of Intervention. For some departments, it may be appropriate to submit all requests via their departmental FHBRO representative. For others, it may be preferable for the project managers to contact FHBRO directly.

Federal heritage buildings may also be designated as national historic sites, or may be situated within one. When a department considers intervening on a building with more than one designation, all the heritage values should be taken into consideration. Departments can consult Parks Canada, through FHBRO, for advice on how to address such situations, and to obtain information about the reasons for the national historic site designation. Although the policy does not set out specific obligations regarding national historic sites, their heritage value should be protected just as in the case of federal heritage buildings.

Preparation of the Review of Intervention report

A special service agreement is in place with the Heritage Conservation Directorate, within Public Works and Government Services Canada (PWGSC–HCD), who are the federal government’s heritage conservation experts. The Heritage Conservation Directorate provides FHBRO with technical advice, as required, and prepares the Review of Intervention reports. Their analysis and recommendations are based on the following reference documents:

- The Heritage Character Statement for the building
- The Standards and Guidelines for the Conservation of Historic Places in Canada
It is important to note that the purpose of the Review of Intervention report is not to corroborate proposed technical solutions. Rather, its purpose is to consider whether a building’s heritage character, as defined in the Heritage Character Statement, will be protected and whether the project complies with the conservation practice defined in the Standards and Guidelines for the Conservation of Historic Places in Canada. The reviewer may nonetheless comment on technical solutions that appear inappropriate for ensuring the building’s integrity, or that of its component elements.

The Review of Intervention report consists of the following sections:

1. Basic information
2. Reference materials consulted
3. Description of the proposed work and the reason for the intervention
4. The impact on heritage value and character-defining elements (in the form of comments)
5. Recommendations

Once the Review of Intervention report has been approved by the Manager of FHBRO, it is sent by fax to the project contact within the custodian department. The original signed version of the cover letter and paper copy of the report are then sent by mail.

In the case of formal reviews, another step is required to ensure an even more thorough and authoritative process. In such cases, the FHBC\(^{29}\) is invited to provide recommendations to FHBRO on the proposed intervention. The Manager of FHBRO organizes a meeting of the Committee, at which the custodian department is asked to present the project. The Committee members then make recommendations to FHBRO, which forwards the final recommendations in writing to the custodian department.

The time required to process a Review of Intervention request (from the time the documents are received until the final report is sent out) is between three and four weeks. FHBRO does everything possible to respond more quickly to urgent requests. In the case of formal reviews, the timeframe is generally six to eight weeks.

Follow-up Reviews of Intervention are often required to review responses to the recommendations of an initial report (this is nearly always the case for complex projects or projects with several phases). In such cases, the Review of Intervention report will clearly indicate this to the applicant (in the Recommendations section), specifying what information or other reference documents should be submitted to FHBRO.

The Machine Shop, constructed in 1924, is a Recognized Federal Building. As a key structure for the mining operations of the Bear Creek service facility and the largest building on the site, the Machine Shop is one of the best illustrations of the facility’s association with the corporate phase of the Yukon’s gold mining history. The Machine Shop, the most dominant building on the site due to its sheer scale, reinforces the industrial character of this complex. This large structure, with its unusual front elevation, is a conspicuous and memorable landmark.

\(^{29}\) The composition of the FHBC is the same for both heritage evaluations and formal reviews.
THE STANDARDS AND GUIDELINES FOR THE CONSERVATION OF HISTORIC PLACES IN CANADA

It is up to custodian departments, whose decisions have an impact on federal heritage buildings, to ensure that their interventions respect the heritage value and character-defining elements identified in an evaluation.

In order to help departments meet their obligations with respect to federal heritage buildings, FHBRO adopted the new Standards and Guidelines for the Conservation of Historic Places in Canada immediately upon their publication in 2003. The Standards and Guidelines, like the FHBRO Code of Practice used before it, are based on internationally recognized conservation principles. They help foster informed decision-making with respect to the planning and use of historic places, and help to ensure that appropriate interventions are undertaken that preserve heritage character.

FHBRO bases all of its Reviews of Intervention on the conservation approach set out in the Standards and Guidelines. It is therefore essential that custodian departments provide copies of the document to consultants working on projects involving federal heritage buildings.

Treatment types

The Standards and Guidelines identify three types of conservation treatments: preservation, rehabilitation and restoration. The choice of treatment depends on the principal goals of the project and the heritage value of the place.

The Standards

The Standards are a set of fundamental conservation principles, based on international charters and best practices in Canada. There are nine standards applicable to all types of projects, three additional standards for rehabilitation projects and two additional standards for restoration projects.

The Guidelines

The Guidelines provide practical advice for decision-making when undertaking interventions that may have an impact on character-defining elements that contribute to the heritage value of a building. The Guidelines are presented in a format that provides recommended and non-recommended actions and are structured according to the order of magnitude of the intervention, from minor actions to major interventions. The Guidelines do not provide technical advice and do not replace conservation advice provided by experts.

You can consult or download the Standards and Guidelines for the Conservation of Historic Places in Canada at www.historicplaces.ca. A paper copy may also be obtained by emailing historicplaces@pc.gc.ca.

For the complete list of Standards, see Appendix V.
Preservation

The action or process of protecting, maintaining and/or stabilizing the existing materials, form and integrity of a historic place, or of an individual component, while protecting its heritage value.

Rehabilitation

The action or process of making possible a continuing or compatible contemporary use for a historic place, or of an individual component, through repair, alterations and/or additions, while protecting its heritage value.

Restoration

The action or process of accurately revealing, recovering or representing the state of a historic place, or of an individual component, as it appeared at a particular period in its history, while protecting its heritage value.

Hardware
Centre Block, Parliament Hill
Ottawa, Ontario
© C. Lefebvre, 1995
The first step in preserving architectural metals is to identify the type of metal. Before cleaning, it is important to determine if cleaning is appropriate for the particular metal: removing the patina if it is a character-defining finish of the metal or if it provides a protective coating is not recommended. If cleaning is appropriate, testing is recommended to ensure that the gentlest method is used.

Disinfection Building
Grosse-Île, Quebec
© Parks Canada; J.P. Jérôme, 1997
This building is part of Grosse Île and the Irish Memorial National Historic Site of Canada. Located in the middle of the St. Lawrence River, Grosse Île was a quarantine station for the Port of Quebec from 1832 to 1937. At the time, the island was the main point of entry for immigrants coming to Canada. The building’s rehabilitation involved stabilizing the structure, upgrading it to current standards and preserving as many of the original features as possible. The building is used mainly to house interpretive installations and washroom facilities.

Vaux Wall
Parliament Hill, Ottawa, Ontario
© María Inés Subercaseaux, 1996
Recreating a missing feature must be based on physical or documentary evidence. For the reconstruction of this rosette, the expertise of masonry restoration specialists (conservation architect, sculptor, etc.) was required.

CHECKLIST

✓ Did the department submit to FHBRO all planned interventions that are likely to affect the heritage character of the Classified buildings that it administers?

✓ Did the department seek appropriate conservation advice regarding all interventions that are likely to affect the heritage character of the Recognized buildings that it administers?

✓ Was the Heritage Character Statement distributed to those who are likely to intervene on a federal heritage building (managers, maintenance staff, occupants, consultants)?

✓ Do these people understand the meaning and scope of the Heritage Character Statement? For example, have they taken FHBRO training?

✓ Did the department give a copy of the Standards and Guidelines for the Conservation of Historic Places in Canada to all employees, consultants or others involved in interventions to federal heritage buildings?
CUSTODIAN DEPARTMENT OBLIGATIONS

The Treasury Board Policy on Management of Real Property states that the departments must:

- consult FHBRO prior to demolishing, dismantling or selling a federal heritage building.
- ensure that best efforts are made to arrange for appropriate alternative uses of under-utilized or excess classified and recognized buildings, first within the federal government and then outside the federal government.\(^\text{32}\)

The federal government recognizes that using heritage buildings on an ongoing basis is the best way of ensuring their long-term survival. That is why the policy requires that custodian departments make “best efforts” to find appropriate alternative uses, in other words uses that protect heritage character, for surplus federal heritage buildings. In addition, since federal heritage buildings lose their protections under the Treasury Board policy once they leave the federal inventory, the custodian department is required to search for a new user within the federal government, before looking beyond that. The transfer of a surplus federal heritage building from one department to another may be one way to help ensure its ongoing preservation.

With respect to arranging for appropriate alternative uses for surplus federal heritage buildings, the Guide to the Management of Real Property\(^\text{33}\) states that “best efforts” means, at a minimum:

- for a Classified federal heritage building, taking steps to protect the building’s heritage character and specifying the nature and level of protection in the sales agreement – protection could mean a heritage covenant, easement, or servitude registered on title that specifies the conservation requirements;
- for a Recognized federal heritage building, exploring options and deciding whether to continue to protect its heritage character; and when applicable, specifying the nature and level of any heritage protection in the sales agreement. If a decision is made not to protect the heritage character, this decision must be justified and documented.

\(^{32}\) Treasury Board Policy on Management of Real Property, s. 6.1.10.

\(^{33}\) Guide to the Management of Real Property, s. 7.2.3.
**STEPS IN THE PROCESS**

The disposal process includes several steps, notably:

1. **Consulting FHBRO**
2. **Preparation of a disposal report**
3. **Updating the FHBRO database and recording the heritage character of the building**

**1 Consulting FHBRO**

The role of FHBRO in the disposal process is to provide support to custodian departments, by advising them on potential alternative uses for surplus federal heritage buildings, appropriate levels of protection (if buildings leave the federal inventory) and the nature and level of heritage recording required. FHBRO may also help custodian departments draft heritage clauses to be used in sales agreements.

It is recommended that the custodian department contacts FHBRO as soon as a disposal process is initiated, or as soon as a building has been identified as surplus to the department’s requirements, so that it has sufficient opportunity to explore all avenues that FHBRO might suggest to it. This step also ensures that the department has the core documents that describe the heritage character of the building, and understands the policy requirements and FHBRO’s procedures.

The custodian department may need to consult FHBRO several times as its disposal strategy evolves, whether to obtain advice on alternative uses or to discuss possible options with respect to the nature and level of protection being considered.

It is important that all plans to dispose of federal heritage buildings, whether “routine” or “strategic”, be discussed with FHBRO.

**2 Preparation of a disposal report**

The purpose of a disposal report is to demonstrate to FHBRO that the policy requirements have been met.

When the custodian department has identified an acceptable alternative use and an organization or entity that is interested in acquiring the surplus building, it must submit a detailed report to FHBRO that describes the following:

- Consultations undertaken with other departments and organizations, as well as with FHBRO, about potential alternative uses. If selling the surplus heritage building to an organization or entity outside the federal government, departments should demonstrate that they first looked to the provincial government, to the municipal government and to heritage groups.

- The various options considered with respect to protection of the building after disposal.

- The nature and level of protection to be given to the building, following its disposal, which the department must include in the transfer or sales agreement, or any other legal document (e.g. a servitude).

FHBRO reviews departmental reports and confirms in writing whether the department has made “best efforts” and therefore met the requirements of the policy.

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34 Guide to the Management of Real Property, s. 7.2.3
Demolition

In cases where a department wishes to propose the demolition of a federal heritage building, it should consult FHBRO as early as possible to ensure that all reasonable options to preserve the building have been considered. Although demolition is an option that FHBRO would never recommend, it recognizes that there may be special circumstances in which a department is left with no other choice.

Once an analysis of options has been completed, the department must submit a report to FHBRO, which demonstrates that all options to preserve the building were explored and that the only viable option is demolition of the building. This report must include a summary of the options and alternatives that were considered, along with a detailed justification of the final decision to demolish the building, and demonstrate:

- a thorough understanding of the building’s condition;
- a thorough analysis of reinvestment or retrofit options;
- that the possibility of mothballing the building was considered;
- that all groups with an interest in the building were notified and consulted.

FHBRO reviews these reports and confirms in writing whether the department has made “best efforts” in accordance with the policy.
Updating the FHBRO database and recording the heritage character of the building

Once the disposal has been completed and the building has left the federal inventory or has been transferred to another department, the former custodian department must inform FHBRO so that its database and the Register of Government of Canada Heritage Buildings can be updated.

Departments must prepare a heritage recording of the building before the building leaves the federal inventory, or before it proceeds with demolition. A heritage recording of a building, which documents its key features and character-defining elements, preserves important information that might otherwise be lost following its demolition or the sale of the building to another organization. FHBRO should be consulted regarding the nature and level of recording to undertake.

Departments are advised to consult Parks Canada when selling a property containing a national historic site, or part thereof, and prepare a heritage recording of the property if it leaves the federal inventory. They should also notify Parks Canada at the end of the disposal process.  

Jackfish Warden Patrol Cabin
Wood Buffalo National Park, Northwest Territories
© B. Hartop, 1989

The Jackfish Warden Patrol Cabin, built in 1929, is a Recognized federal heritage building. The cabin is associated with the federal government’s commitment to protect endangered wildlife by expanding its national parks system. Wood Buffalo National Park, established in 1922, is the largest game sanctuary in Canada and one of the largest in the world. The cabin is the only remaining one of 26 that were erected in the park by wardens between 1922 and 1934 and is typical of the larger year-round residential cabins of the time.

CHECKLIST

✓ Does the department have a list of federal heritage buildings that will become surplus within the next few years?
✓ Did the department contact FHBRO to obtain the information required in order to proceed with the disposal of a federal heritage building?
✓ Did the department make “best efforts” to find an appropriate new use for the surplus building within the department?
✓ Were other federal departments or agencies approached? Were other levels of government (provincial, municipal) or not-for-profit heritage conservation organizations contacted?
✓ Did the department advise FHBRO once a final strategy was developed?
✓ Before disposing of a designated building, did the department prepare a heritage recording of the building?
✓ In the case of a national historic site disposal, was Parks Canada consulted? Was Parks Canada advised once the process had been completed?
✓ Did the department advise FHBRO as soon as the building left the department or the federal government?

35 Guide to the Management of Real Property, s. 7.2.3.
Training courses are given by FHBRO in order to provide more information about heritage obligations under the policy, the role of FHBRO and the advice it provides, and best practices regarding the protection of the heritage character of federal heritage buildings. These courses are provided for departmental employees who are responsible for administering and operating federal heritage buildings, as well as for their consultants.

The FHBRO introductory course is highly recommended for anyone involved in the management and maintenance of federal heritage buildings, as well as for project managers and professionals involved in the development and implementation of projects that could affect heritage character. The course covers departmental heritage obligations under the Treasury Board Policy on Management of Real Property, and explains FHBRO’s advisory role. It focuses on the processes set out in the policy (evaluation, intervention review and disposal), as well as on reference tools such as the Heritage Character Statement and the Standards and Guidelines for the Conservation of Historic Places in Canada.

The two-day course is free of charge.

Contacting FHBRO

FHBRO may be contacted by mail or telephone at the coordinates below:

Federal Heritage Buildings Review Office (FHBRO)

Parks Canada
25 Eddy Street (25–5–P)
Gatineau, Quebec, Canada
K1A 0M5

General information:

FHBRO Manager: 819–997–6965
Registrar: 819–997–6740
Policy Analyst: 819–994–6333
Web site: www.pc.gc.ca

Standards and Guidelines for the Conservation of Historic Places in Canada

The Standards and Guidelines can be found at: www.historicplaces.ca.

A paper copy of the Standards and Guidelines can also be obtained by e-mailing: historicplaces@pc.gc.ca.
LEGISLATION, REGULATIONS AND POLICIES

Treasury Board — Policy on Management of Real Property
www.tbs-sct.gc.ca

Treasury Board — Directive on the Sale or Transfer of Surplus Real Property
www.tbs-sct.gc.ca

Treasury Board — Guide to the Management of Real Property
www.tbs-sct.gc.ca

Financial Administration Act
laws.justice.gc.ca

Parks Canada Agency Act
www.pc.gc.ca

Historic Sites and Monuments Act
www.pc.gc.ca

Parks Canada Cultural Resource Management Policy
www.pc.gc.ca

Parks Canada Guidelines for the Management of Archaeological Resources
www.pc.gc.ca

OTHER RESOURCES

Directory of Federal Real Property
www.tbs-sct.gc.ca

Treasury Board of Canada Secretariat Web site
www.tbs-sct.gc.ca

Treasury Board Secretariat Real Property Management Policy Branch Web site
www.tbs-sct.gc.ca

Treasury Board Secretariat document — Understanding Federal Real Property Management
www.tbs-sct.gc.ca

Detail of interior postal wicket
Dominion Public Building
Halifax, Nova Scotia

© Courtesy of Records Disposal, Public Works, Tupper Building.
ORGANIZATIONS

Canadian Association of Heritage Professionals (CAHP)
The Canadian Association of Heritage Professionals provides:
• advice on locating heritage consultants (by region, and with an emphasis on built heritage)
• advice on their Code of Professional Conduct and Ethics
Web site: www.caphc.ca

Heritage Conservation Network, Public Works and Government Services Canada
The Heritage Conservation Network, as the Centre of Expertise servicing all federal government departments, provides professional and technical expertise for the protection and management of designated heritage buildings, landscapes and engineering works.
It offers a full range of multidisciplinary services including:
• heritage recording (surveying, rectified photography, photogrammetry)
• strategic advisory services for owners, managers and custodians (technical input to policy development, maintenance frameworks, management plans, etc.)
• pre-design investigation and research (advanced technical analysis, RFP development, options analysis)
• design (guidelines, drawings, specifications)
• project management (planning, scheduling, estimating, construction contract administration)

For more information, call 819–953–1960.

Canadian Conservation Institute
The Canadian Conservation Institute provides departments with assistance, advice and information about:
• preventive conservation
• preservation of collections and heritage property
• conservation maintenance and treatment
• emergency response and disaster preparedness
• contracting of professional conservation services

For more information, call 1–866–998–3721.
Web site: www.cci-icc.gc.ca

Parks Canada
Parks Canada can provide departments with:
• tools, guidelines and online resources, as well as information about cultural resource management principles and practices
• information and advice regarding the Government of Canada’s Archaeological Heritage Policy Framework (1990).
E-mail: information@pc.gc.ca
Web site: www.pc.gc.ca
6. **Policy Requirements**

6.1 Deputy heads are responsible for ensuring that:

6.1.9 The heritage character of federal buildings is respected and conserved throughout their life cycle. Buildings that are 40 years of age or older, whether Crown-owned buildings under the administration of their minister or buildings they are planning to purchase, must be evaluated by Parks Canada for their heritage character.

6.1.10 Where their minister has administration of heritage buildings: conservation advice is sought for recognized heritage buildings; consultations with Parks Canada are undertaken before demolishing, dismantling or selling a recognized heritage building and before taking any action that could affect the heritage character of a classified building; and best efforts are made to arrange for appropriate alternative uses of under-utilized or excess classified and recognized heritage buildings, first within the federal government and then outside the federal government.

8. **Roles and Responsibilities of Other Government Organizations**

**Note:** This section is meant to inform departments of other significant players in the management of real property. In and of itself, it does not confer an authority.

8.11 Parks Canada establishes national goals to protect federal heritage buildings and national historic sites. It also develops policies, standards and guidelines in consultation with other departments. Through the Federal Heritage Buildings Review Office, Parks Canada provides criteria and a process for evaluating and designating heritage character, provides advice and recommendations to other departments, and maintains a register of federal heritage buildings. The minister responsible for the Agency is responsible for approving the heritage designations for federal buildings based on the recommendation of an interdepartmental advisory board.
Appendix II

Excerpts of the Guide to the Management of Real Property

3. Objectives and Principles of Real Property Management

3.3 Fulfilling government objectives

3.3.5 Heritage

The Government of Canada has special stewardship responsibilities with regard to the preservation of Canadian cultural heritage.

FHBRO Evaluation criteria are based on international conservation principles. Federal buildings are evaluated against the following criteria:

- historical associations
- architecture
- environment

Heritage buildings: The minister of the Environment is responsible for approving the heritage designation of federal buildings while individual deputy heads, under Treasury Board policy, are responsible for respecting and conserving the heritage character of federal Crown-owned buildings and for all decisions affecting their heritage character.

To meet their responsibilities with respect to heritage buildings, departments work with the Federal Heritage Buildings Review Office (FHBRO) of Parks Canada to evaluate all Crown-owned buildings 40 years of age or older. This evaluation is done by the Federal Heritage Buildings Committee, which includes representation of the custodian department.

- Any building evaluated by the Committee is designated as either a classified, recognized, or non-designated federal building. These categories are defined as follows:
- A classified federal heritage building is any building to which the minister of the Environment has assigned the highest heritage designation. These buildings are the best examples of built heritage in Canada based on their heritage character and have scored between 75 and 135 points in the evaluation.
- A recognized federal heritage building is any building to which the minister of the Environment has assigned the second-highest heritage designation. These buildings represent some of the best buildings in the country that have significant heritage elements that require protection, as defined in the Heritage Character statement, and have scored from 50 to 74 points in the FHBRO evaluation.
- A non-designated federal building is any building that has been evaluated by FHBRO and scored below 50 points, and were determined not to have enough heritage significance to rate a heritage designation. There are no special heritage obligations.

It should be noted that departments are not precluded from seeking an evaluation for buildings less than 40 years old. Departments can seek advice from FHBRO on whether or not an earlier evaluation is warranted in a particular instance.

Departments managing heritage buildings can seek advice from conservation specialists and consult with FHBRO, which assists federal departments in the protection of heritage buildings.

While Treasury Board policy is focussed on heritage buildings, real property managers also deal with issues concerning national historic site designations on property they use. Departments should consult with Parks Canada when planning any interventions, including disposals, at national historic sites. Departments are guided by various standards and best practices developed by Parks Canada on the conservation of historic places in Canada, including engineering works, landscapes,
heritage buildings, national historic sites, and archaeological resources contained on lands departments administer.

5. Acquisition

5.3 Due diligence and government objectives

5.3.5 Heritage

When considering purchasing a building that is 40 years old or more, departments should seek the advice of Parks Canada’s Federal Heritage Buildings Review Office (FHBRO) to determine potential heritage designations, understand the significance of the potential designation, in particular its impact on the suitability of the property in meeting program requirements within annual investment amounts that are affordable to the department.

Before purchasing an asset that has heritage value, the department must clearly understand what special care will be required to protect the heritage character.

Heritage characteristics of assets newly acquired by a department will be described by Parks Canada in the designated building’s Heritage Character Statement. Departments acquiring heritage buildings are encouraged to prepare a conservation plan at the time of designation to ensure that the building’s heritage character is fully understood by the property manager and that a whole life maintenance and repair plan is prepared. Costs related to the life cycle conservation of the character elements should be included in investment plans for those assets. It should never be said that Canada’s acquisition of a heritage asset caused its heritage value to be diminished or lost.

Because the operation, maintenance, and recapitalization costs of older assets can be higher than those for new assets, departments must fully cost out their options and ensure that the acquisition provides best value to the Crown. When acquiring a heritage building, or one that is likely to be designated as such, departments must ensure that this is the best option available based on the business case, and that it can afford to conserve the heritage value of the building. In the event of a transfer of administration of a heritage property from one federal custodian to another, of course, the net impact upon the federal government as a whole should be neutral but the acquiring department should nevertheless become familiar with its new responsibilities, prepare a conservation plan, and include costs related to acquiring and maintaining the asset in its strategic investment plan.

When departments are constructing a new building or doing extensive renovations such as additions that require digging, advice is available from Parks Canada concerning archaeological considerations.

6. Use and Occupancy

6.6 Due diligence and government objectives

6.6.5 Heritage

Custodian departments should have a plan in place to have all Crown-owned buildings in their custody that are 40 years of age or older evaluated as to their heritage character. This plan would be developed in concert with departments’ acquisition, operation, maintenance, and disposal strategies that will invariably identify buildings in use that either require evaluation or have been evaluated and must be managed in a manner that respects and conserves the heritage character.

- Classified Heritage Buildings. Departments must seek FHBRO’s guidance before making any interventions and changes of use, including any operations and maintenance that could affect the heritage character-defining elements, as identified in the Heritage Character Statement. Standards and guidelines for the conservation of historic places in Canada are available to provide practical advice to departments.

- Recognized Heritage Building. For alterations, changes of use, or other interventions that
could affect heritage character, departments must obtain appropriate conservation advice. This advice can be obtained from a private- or public-sector conservation expert, including FHBRO.

Advice is available from Parks Canada on how to maintain the potential heritage character of “legacy buildings,” which are buildings that are expected to become heritage from the day they were built, based on criteria such as historic associations, architectural qualities, and environmental factors. A good example of a legacy building is the Canadian War Museum in Ottawa.

6.7 Review checklist (extracts):

• Have buildings over 40 years old been submitted to FHBRO for review?
• Are designated buildings being managed in a manner that protects their heritage character, informed by the Heritage Character Statement?
• Have conservation plans been developed for designated buildings?

7. Disposal

This section refers to the last phase of the physical life cycle of real property, i.e., the disposal by sale or transfer of the asset. In this context, disposal does not include leases, licences, or easements, which are covered in sections 6 and 8. In addition, although demolition often marks the last phase in an asset’s life cycle, this topic is not covered within this section. Departments may wish to consult the Treasury Board Contracting Policy prior to engaging contractors for the demolition of assets on federal real property.

7.2 Stages of the disposal process

7.2.3 Due diligence and government objectives

Heritage

Departments should consult with the Federal Heritage Buildings Review Office (FHBRO) on heritage conservation measures as early as possible in the disposal process to allow for due consideration of FHBRO’s advice and recommendations.

With respect to arranging for alternative uses of underutilized or excess classified and recognized heritage buildings, «best efforts» means, at a minimum:

• in the case of a classified heritage building, taking steps to protect the building’s heritage character and specifying the nature and level of protection in any sale agreement—this could include attaching a heritage covenant, easement, or servitude registered on title that specifies the conservation requirements; or
• in the case of a recognized heritage building, deciding whether to continue to protect its heritage character, and specifying the nature and level of any heritage protection in any sale agreement.

If looking to organizations outside the federal government to arrange for alternative uses, departments should first look to the provincial government, to the municipal government, and to heritage groups.

When a heritage building leaves the federal inventory, the custodian department should notify FHBRO so that the organization’s database of federal heritage buildings remains accurate and relevant.

Departments should also consult Parks Canada when selling a property containing a national historic site or part thereof, make a record of the property if it leaves the federal inventory, and notify Parks Canada at the end of the disposal process.
# EVALUATION CRITERIA

## Historical Associations

<table>
<thead>
<tr>
<th>Thematic</th>
<th>How well does the building illustrate an important theme in Canadian history?</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>A. One of best examples</td>
<td>15</td>
<td></td>
</tr>
<tr>
<td>B. Very good example</td>
<td>8</td>
<td></td>
</tr>
<tr>
<td>C. Convenient or useful example</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>D. Obscure example</td>
<td>0</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Person/Event</th>
<th>What is the level of importance of a directly associated person or event?</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. National/international</td>
<td>10</td>
</tr>
<tr>
<td>B. Regional</td>
<td>6</td>
</tr>
<tr>
<td>C. Community</td>
<td>4</td>
</tr>
<tr>
<td>D. No association</td>
<td>0</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Local Development</th>
<th>How well does the building illustrate a significant phase in the development of the community, or a major change or turning point in the community’s history?</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. One of best examples</td>
<td>(10)</td>
</tr>
<tr>
<td>B. Very good example</td>
<td>(6)</td>
</tr>
<tr>
<td>C. Convenient or useful example</td>
<td>(4)</td>
</tr>
<tr>
<td>D. Obscure example</td>
<td>(0)</td>
</tr>
</tbody>
</table>
### Architecture

#### Aesthetic Design
What is the visual quality of the building (proportion, scale, detail) in the context of an architectural style or type?

<table>
<thead>
<tr>
<th>Rating</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Excellent</td>
<td>25</td>
</tr>
<tr>
<td>B. Very good</td>
<td>13</td>
</tr>
<tr>
<td>C. Good</td>
<td>9</td>
</tr>
<tr>
<td>D. Fair or poor</td>
<td>0</td>
</tr>
</tbody>
</table>

#### Functional Design
What is the functional quality of the building (effectiveness of materials, layout and method of construction) in the context of engineering history and functional types?

<table>
<thead>
<tr>
<th>Rating</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Excellent</td>
<td>15</td>
</tr>
<tr>
<td>B. Very good</td>
<td>8</td>
</tr>
<tr>
<td>C. Good</td>
<td>5</td>
</tr>
<tr>
<td>D. Fair or poor</td>
<td>0</td>
</tr>
</tbody>
</table>

#### Craftsmanship and Materials
What is the quality of the workmanship and the handling of materials?

<table>
<thead>
<tr>
<th>Rating</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Excellent</td>
<td>10</td>
</tr>
<tr>
<td>B. Very good</td>
<td>6</td>
</tr>
<tr>
<td>C. Good</td>
<td>4</td>
</tr>
<tr>
<td>D. Fair or poor</td>
<td>0</td>
</tr>
</tbody>
</table>

#### Designer
What is the significance of this building as an illustration of the work of an important designer?

<table>
<thead>
<tr>
<th>Rating</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. One of best examples</td>
<td>5</td>
</tr>
<tr>
<td>B. Very good example</td>
<td>3</td>
</tr>
<tr>
<td>C. Known example</td>
<td>2</td>
</tr>
<tr>
<td>D. Designer not identified / importance of designer not substantiated</td>
<td>0</td>
</tr>
</tbody>
</table>
### Environment

<table>
<thead>
<tr>
<th>Site</th>
<th>What is the integrity of the historical relationship between the building and its associated landscape?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>A. Unchanged</td>
</tr>
<tr>
<td></td>
<td>B. Changed and character retained</td>
</tr>
<tr>
<td></td>
<td>C. Changed and character heavily altered</td>
</tr>
<tr>
<td></td>
<td>D. Character destroyed</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Setting</th>
<th>What is the influence of the building on the present character of the area with which it is associated?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>A. Establishes present character</td>
</tr>
<tr>
<td></td>
<td>B. Reinforces present character</td>
</tr>
<tr>
<td></td>
<td>C. Compatible with present character</td>
</tr>
<tr>
<td></td>
<td>D. Negative influence</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Landmark</th>
<th>What is the nature of the building's identity within the community?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>A. Symbol of city/region</td>
</tr>
<tr>
<td></td>
<td>B. Conspicuous or familiar – city/region</td>
</tr>
<tr>
<td></td>
<td>C. Conspicuous or familiar – neighborhood</td>
</tr>
<tr>
<td></td>
<td>D. Not conspicuous or familiar</td>
</tr>
</tbody>
</table>

### EXPLANATORY NOTES

#### Historical Associations

These three criteria, “Thematic”, “Person/Event” and “Local Development”, allow for the evaluation of the associative value of the building.

**Thematic**

“How well does the building illustrate an important theme in Canadian history?”

The criterion evaluates the building in the context of broad themes of Canadian history. Themes are historical phenomena or processes having both geographical and chronological dimensions, such as development of self-government, exploitation or natural resources, industrialization or creation of national communications systems. Themes identified by the FHBRO should be significant, though not necessarily national in scope. For example, fisheries as a theme is undeniably an important theme in Canadian history although its significance does not apply equally to all provinces. The FHBRO evaluators should be prepared to identify themes with some precision, rather than merely referring to “social history” or “military history”.
**Person/Event**

“What is the level of importance of a directly associated person or event?”

This criterion evaluates the building with respect to this direct association with persons and events. “Directly associated” is defined as ownership or occupancy in the case of a person, or a specific event that took place in the building. In other words, it has a specific sense and does not refer to more general associations. For example, public buildings like post offices, though frequented by many important persons, will seldom merit points under this criterion. “Events” of long duration, such as public works relief projects or production of Victory bonds, are not to be considered under this criterion but rather under “Thematic”.

**Local Development**

“How well does the building illustrate a significant phase in the development of the community, or a major change or turning point in the community’s history?”

This criterion evaluates the building as evidence of a significant phase in the community’s development or historical evolution. It measures the building’s influence over time and in a historical perspective, and should not be confused with its present situation which is assessed under “Setting”. While the definition of “community” must be made by the FHBRO, suggested guidelines include the ward of a city, an entire park or the intra-muros space of a penitentiary.

**Architecture**

These four criteria, “Aesthetic Design”, “Functional Design”, “Craftsmanship” and “Designer” are meant to measure the intrinsic value of the physical structure both in design and in execution. The present condition (integrity) of the building should be taken into consideration in the application of these criteria, in the knowledge that inappropriate modifications and deteriorated fabric could weaken the architectural value of the building. These judgements will have to be made by the FHBRO.

**Aesthetic Design**

“What is the visual quality of the building (proportion, scale, detail) in the context of an architectural style or type?”

This criterion measures the architectural merit of the building, taking into account historical styles and/or building types. A building may deserve high marks if its design is successful and visually attractive, whatever its style or type. Evaluators, because they are rating buildings from a historical perspective as well as design, should attempt to discount their own personal stylistic preferences. The integrity of the building may affect the rating of “Aesthetic Design”, since a structure that has suffered severe alterations may be weaker in visual qualities.

**Functional Design**

“What is the functional quality of the building (effectiveness of materials, layout and method of construction) in the context of engineering history and functional types?”

This criterion evaluates the functional merit of the building, apart from aesthetic considerations. It is intended to provide a means of giving value to our engineering and industrial heritage, where “high-style” solutions are not relevant. It measures how effectively a particular building programme has been carried out, taking into account available technology and previous solutions to particular functional problems.

**Craftsmanship and Materials**

“What is the quality of the workmanship and the handling of materials?”

This criterion evaluates the actual execution of the design, with a focus on quality. It takes into consideration both the choice and handling of
materials. Knowledge of the historical context may shed light on the quality of craftsmanship and materials. The current physical condition of the building may reveal the strengths and weaknesses of workmanship and materials over time. Good quality should be evident in spite of reversible changes. It is left to the FHBRO to judge whether to apply this criterion to the whole or just part of specific buildings.

**Designer**

“What is the significance of this building as an illustration of the work of an important designer”?

This criterion evaluates the importance of this building as an illustration of the work of an important designer.

This criterion evaluates the importance of the building in the designer’s career. “Designer” may include architects, builders or engineers, both private and public, both individually or as professional firms or federal departments. Whether or not a designer is important (either locally or nationally in Canada or elsewhere) will be assessed in the evaluation report, permitting the committee to evaluate the importance of the specific building in the designer’s career. While buildings which have been demolished will contribute to the global understanding of a designer’s career, evaluators should focus on surviving examples. If it is not possible to state that the building is the work of an important designer, the committee should award the building 0 under this criterion.

**Environment**

The three criterias «Site», «Setting» and «Landmark» are intended to measure the present-day role of the building in the community’s streetscape.

**Site**

“What is the integrity of the historical relationship between the building and its associated landscape?”

This criterion measures the degree to which the immediate environment enhances and strengthens the building. The associated landscape is normally that contained within the property lines and over which the owner has control. For some urban buildings, the evaluation may be limited to the interface between the building and the adjacent sidewalk or public space. Integrity is judged by considering the original or historic treatment in relation to the nature of what exists today.

**Setting**

“What is the influence of the building on the present character of the area with which it is associated?”

This criterion measures the influence of the building on its streetscape or surroundings, to be interpreted as broader than the limited space referred to under “Site”. The “present character of the area” should be considered in an urban design sense, as well as in terms of building types. The character of urban space may be homogeneous or heterogeneous, depending on circumstances. The FHBRO will have to decide, in the case of complexes, how they wish to define “area”.

**Landmark**

“What is the nature of the building’s identity within the community?”

This criterion evaluates the importance of a building to the community. While it is partially a matter of physical landmark (i.e. a prominent church spire) it also applies to the symbolic value of a building to the community as a whole.
FHBRO HERITAGE CHARACTER STATEMENT
TOWN CLOCK ON CITADEL HILL, HALIFAX, NOVA SCOTIA

FHBRO number: 02-118
DFRP number: 02991
Resource name: Town Clock on Citadel Hill, National Historic Site of Canada
Address: Halifax Citadel, Brunswick Street, Halifax, Nova Scotia
FHBRO status: Classified Federal Heritage Building
Construction: 1960-1962
Designer: Parks Canada, following an original 1803 design by Captain Fenwick of the Royal Engineers
Original function: Town Clock (tower) and caretaker’s residence (lower floor)
Current function: Clock (tower) and exhibition space (lower floor)
Modifications: Full restoration of the exterior to its current appearance, which is reminiscent of the original garrison clock (early 1990s)
Custodian: Parks Canada Agency

Description of Historic Place

The Halifax Town Clock is a faithful reconstruction of an early 19th century Palladian structure. Clad in white wood clapboard and shingles, the building consists of a symmetrical rectangular base supporting a three-tiered octagonal tower, and features typical classical elements and details. The tower is composed of a round-plan colonnade, which supports the octagonal clock storey, which in turn supports an octagonal arcaded storey and is crowned by a copper dome and a balustrade and copper ball. The structure still contains the original functional clock mechanism, which has been operating since October 20, 1803. It is set on the grassed eastern glacis of the Halifax Citadel, fronting onto Brunswick Street. The designation is confined to the footprint of the building.

Heritage Value

The Halifax Town Clock is a “Classified” Federal Heritage Building because of its historical associations, and its architectural and environmental values.
**Historical value:**

The Halifax Town Clock is associated with the national theme of the pre-Venice Charter heritage conservation movement. A very faithful reconstruction of its predecessor, it reflects the conservation approach of the early 1960s in Canada and stands out as one of Halifax’s most significant conservation projects of the time. The project was one of the early restoration/reconstruction projects in the area and distinguishes itself as a prominent undertaking. Through its great influence and symbolic importance, it served as an example to alert and sensitize the population to the potential loss of historic structures and helped pave the way for later conservation projects in the city.

**Architectural value:**

As a reconstruction of the original structure, the Halifax Town Clock is a very successful and accurate model of its remarkable Palladian original. Characterized by a symmetrical and balanced composition, monumental scale and elegant proportions, all classical characteristics, the design offers a good solution to the somewhat ambitious and unusual hybrid program it was meant to accommodate. The original design is credited to Captain Fenwick, a Commander of the Royal Engineers. The reconstruction project, lead by Parks Canada architects, demonstrates very good skilled traditional craftsmanship and quality materials, and reflects an overall attention to detail.

**Environmental value:**

Through its strong presence and visibility, the tower reinforces the historic character of Brunswick Street and of the green expanse of the eastern glacis, and marks the boundary between the contemporary city and the historic compound of the Citadel. One of the most recognizable buildings associated with Halifax, the Town Clock is regarded as both a symbolic and visual landmark.

**Character-Defining Elements**

The following character-defining elements of the Halifax Town clock should be respected:

Its remarkable Palladian-inspired aesthetics, its functional design as a clock tower, as well as the high quality craftsmanship and materials invested in the building’s reconstruction, as manifested in:

- the building’s symmetrical and well-proportioned composition, consisting of a rectangular base storey surmounted by a three-tiered clock tower;
- the clock tower’s circular form, a rare subset of Palladian aesthetics;
- the interior layout which includes a central well for the clock pendulum;
- the finely crafted classical elements and details, such as the applied Doric corner pilasters, the entablature at the perimeter of the base storey, the colonnade of twelve Doric columns surmounted by a simple architrave, as well as the frieze, cornices, 12-over-12 and 6-over-6 sash windows, arched openings embellished with moldings and ornamental keystones;
- the use of copper roofs and white wood clapboard and shingles on the exterior;
- the exterior cobalt blue clock faces and copper-clad hands and numerals constructed of copper plate.

The manner in which the building reinforces the historic character of its setting and marks the boundary between the city and the Citadel, as evidenced in:

- the site line from the waterfront to the clock tower through George and Carmichael Streets, which has endured as a significant viewscape;
- the building’s relationship to its surroundings, as a monument placed on the open grassed area of the Citadel’s east glacis;
- the building’s value as a visual monument which recalls Halifax’s 19th Century character.

*May 2004*
General Standards (all projects)

1. Conserve the heritage value of a historic place. Do not remove, replace, or substantially alter its intact or repairable character-defining elements. Do not move a part of a historic place if its current location is a character-defining element.

2. Conserve changes to a historic place which, over time, have become character-defining elements in their own right.

3. Conserve heritage value by adopting an approach calling for minimal intervention.

4. Recognize each historic place as a physical record of its time, place and use. Do not create a false sense of historical development by adding elements from other historic places or other properties or by combining features of the same property that never coexisted.

5. Find a use for a historic place that requires minimal or no change to its character-defining elements.

6. Protect and, if necessary, stabilize a historic place until any subsequent intervention is undertaken. Protect and preserve archaeological resources in place. Where there is potential for disturbance of archaeological resources, take mitigation measures to limit damage and loss of information.

7. Evaluate the existing condition of character-defining elements to determine the appropriate intervention needed. Use the gentlest means possible for any intervention. Respect heritage value when undertaking an intervention.

8. Maintain character-defining elements on an ongoing basis. Repair character-defining elements by reinforcing their materials using recognized conservation methods. Replace in kind any extensively deteriorated or missing parts of character-defining elements, where there are surviving prototypes.

9. Make any intervention needed to preserve character-defining elements physically and visually compatible with the historic place, and identifiable upon close inspection. Document any intervention for future reference.

Additional Standards Relating to Rehabilitation

10. Repair rather than replace character-defining elements. Where character-defining elements are too severely deteriorated to repair, and where sufficient physical evidence exists, replace them with new elements that match the forms, materials and detailing of sound versions of the same elements. Where there is insufficient physical evidence, make the form, material and detailing of the new elements compatible with the character of the historic place.

11. Conserve the heritage value and character-defining elements when creating any new additions to a historic place or any related new construction. Make the new work physically and visually compatible with, subordinate to and distinguishable from the historic place.

12. Create any new additions or related new construction so that the essential form and integrity of a historic place will not be impaired if the new work is removed in the future.
Additional Standards Relating to Restoration

13. Repair rather than replace character-defining elements from the restoration period. Where character-defining elements are too severely deteriorated to repair and where sufficient physical evidence exists, replace them with new elements that match the forms, materials and detailing of sound versions of the same elements.

14. Replace missing features from the restoration period with new features whose forms, materials and detailing are based on sufficient physical, documentary and/or oral evidence.