



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

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Dear Ms Carty

### **DRAFT BS7913 GUIDE TO THE CONSERVATION OF HERITAGE ASSETS**

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

Thank you for inviting us to participate in this consultation.

The Institute welcomes the proposed revision to BS7913, which needs to be kept up-to-date, and is broadly content with the proposed text. We do, however, have a few points we would wish to raise.

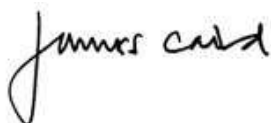
1. The revised BS7913 has the scope to be a very useful and influential document. However, a widespread complaint about the existing BS7913 is its extraordinarily high price. In an age in which guidance documents of all descriptions are commonly available for free download we think, if the current pricing structure is maintained, the revised BS7913 will fail to have the influence that it deserves and be utilized only by a narrow spectrum of specialists. In a period in which increasing numbers of heritage assets are being affected by new uses, modernizations and improvements in energy efficiency, we think this would be a great pity.
2. We think that the draft Document is too closely aligned with terminology in England to be a thoroughly UK Guide. To avoid confusion between policy and practice, terminology should be adjusted to reflect less policy-associated interpretations. So instead of 'assets' the document could use 'resources', or similar, and instead of 'significance' it could use 'values', or similar (deleting as appropriate where generating any repetitions). So for example '3 Heritage values and significance' becomes '3 Heritage values'; and 3.3 Understanding heritage assets, heritage values and significance becomes 3.3 Understanding heritage

resources and values'. In our detailed suggestions we have styled this practice 'UK-Compliant'.

3. This textual adjustment would also serve as a useful clarification across the text as it would address the logical error in the application of 'significance' that can allow for its separation from 'fabric'. As we cannot anticipate the 'significance' that others bring to heritage, particularly those of future generations, we must retain the primary focus of conservation on fabric. By adopting the terminology of 'value' over that of 'significance' the Document could resolve current policy ambiguities and operational variations across the UK, just as a standard such as this should do.
4. Consequentially, we think it is critical that references to processes and documents that do not apply UK-wide should be deleted, in particular those from 'Conservation Principles' (including 'aesthetic, historic and evidential value' etc.). Interestingly, we think this would expand the relevance and clarity of the document.
5. While maintaining values is a critical consideration for the conservation process, it must also be part of a sustainable solution, or, to use a more general, non-policy-based word, it must be 'viable'. In accordance with the principles of Article 2 of the 1993 ICOMOS Guidelines, the practice of conservation must deliver conservation outcomes that secure conservation values in the context of viable solutions. Conservation specialists must be properly qualified and experienced to deliver this. This principle of conservation as a process that provides viable outcomes needs to be included in the introduction.
6. We think there is a fundamental omission at the start of Section 4 about the nature of 'Significance' (as defined in the Draft document) which arises from what we have said about terminology. This is that the term 'significance' and its use as a tool of conservation post-dates the wording of requirements in the primary legislation for heritage control in all of our jurisdictions. It was found in a recent case in England<sup>1</sup> that the assessment of 'significance' was inadequate as it did not also explicitly address the forms of words in the statute. This also illustrates how the use of policy-based terminology applicable in only one part of the UK might also confuse the user of the Document in the devolved administrations. We think that the Document should avoid terminology that confuses policy with practice and that an explanation of this should be given at the start of Section 4. We have included our suggestion in the template.

We have entered our detailed comments in the Response Template document which is attached.

Yours sincerely



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1 East Northants and others v SoSCLG [2013] EWHC 473 (Admin)