Doc name: BS7913		
Doc title: Guide to the conservation of heritage assets	Commentator: Institute of Historic Building Conservation	Date: 31/05/13

Clause/ Subclause	Paragraph Figure/ Table	Type of comment (General/ technical/edit orial)	Comment (with rationale)	Proposed change
		General	We are concerned that the tone of the Document is founded on policy and practice in England and that this does not translate well into a British Standard which will apply to the whole of the UK and its devolved administrations. We think that 'UK Compliant' terminology should be used and make suggestions for this throughout this response. Please see our accompanying letter for a full rationale of this.	
		Foreword	We think that a bit more could be made of the point made under "Use of this document" in the Foreword. We are particularly keen that it should be clearly intended as Guidance for the appropriately qualified and experienced people to use in the course of their professional work and not (as stated) be a compliance standard to be interpreted by amateurs. In our view this paragraph should perhaps lie or be reiterated or amplified in paragraph 1.	
	Document title	General	Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references	Guide to the conservation of heritage resources

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			You might wish to consider extending some of the qualifications occasionally used in the text (regarding eg. in clause1 'built heritage') to the title but it would be preferable to write out the qualifications in the text so that gardens and landscape conservation are not excluded	
01	1	General	Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references	*… protection of the nation's stock of heritage resources,...*
	2	General	Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references	*Securing conservation objectives are also intimately linked to underlying social, cultural, economic and environmental objectives.*
08	2		We think helpful context would be provided with a reference to Sir Patrick Geddes as the founder of area-based conservation.	In the 20th century, the consolidation of ruins and the care of ancient sites by the State were developed by HM Office of Works, while accelerating change led to the growth of preservation and amenity societies *building on the concept of area-based conservation developed by Sir Patrick Geddes.* After 1945 the listing and legal protection of buildings was established through a succession of *Town and Country Planning Acts* [3]...
	2		Omission of key content and/or references and/or sources	International recognition of the importance of building conservation was achieved in 1966 with the publication of the *Venice Charter* by ICOMOS [4], followed in 1981 by the *Burra Charter* of ICOMOS Australia [5] while the fundamental description of the process was enshrined in the 1993 ICOMOS '*Guidelines for education and training*

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				in the conservation of monuments, ensembles and sites'. The 1993 ICOMOS 'Guidelines' remain the common standard for built and historic conservation practice across the UK and beyond.
09	ALL	G/T/E	Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references.	Delete ALL
NEW 09	ALL	G/T/E	We think it would be helpful if there were an additional paragraph concluding the Introduction to describe the intended position of the Guidance in the overall hierarchy in the light of our comments above. Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or reference. Omission of key contextual material and references	*This Guidance is founded in international conservation standards, such as that provided by ICOMOS, and is intended to inform practice that is undertaken under the various statutory planning and heritage control regimes in the UK. Every effort has been made to adopt terminology that will not be confused with that which is specific to policies applying in the devolved administrations.*
1	1		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Omission of key content and/or references and/or sources	This British Standard provides, *information, advice, and guidance best practice in the management and treatment of built heritage resources, including conservation areas, gardens and landscape.* It is applicable to all heritage assets, with or without statutory protection.
	3		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Omission of key content and/or references and/or sources	This British Standard is applicable to those that own, use, occupy and manage heritage *resources*, the professional team's contractors and others employed to work on their behalf and may be used by decision makers and funders.
2.4			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or	**2.4 conservation** action to manage change that secures the

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			references	survival or preservation of heritage *resources and retains their values*
2.6			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references	strategic document that defines what is *valued about an individual heritage resource*, establishes management principles and informs the approach to future work**.**
2.8			Omission of key content and/or references and/or sources	**2.8 design** '*formal, unified and consciously tailored scheme or intent*' *in a heritage resource, including material, disposition and layout'.*
2.9			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references	DELETE
2.10			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references	**2.10 fabric** physical material *constituting a heritage resource.*
2.11			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references	**2.11 heritage resource** *building, monument, site, place, area or landscape considered to have a degree of value.*
2.12			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references	**2.12 heritage impact assessment** *practical assessment of the magnitude of the impact from proposed change on the values of a heritage resource, taking into account options appraisal and possible mitigating factors.*
2.13			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references	**2.13 historic building** *building that has heritage values and is a heritage resource.*

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2.14			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references	**2.14 intervention** *action that has a physical or spatial impact on a heritage resource or its setting.*
2.15			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references	**2.15 maintenance** *routine and reactive work necessary to keep the fabric of a heritage resource in good order.*
2.19			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references	**2.19 preservation** *state of survival of a heritage resource, whether by historical accident or through a combination of protection and active conservation.*
2.20			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references	**2.20 protection** *provision of legal restraints or controls on the destruction or damaging of historic resources and their setting, with a view to their survival or preservation for the future.*
2.21			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	**2.21 record** *description, depiction and analysis of a heritage resource using drawings, survey, photographs and any other suitable means and the preservation of documents, photographs and other material relating to the place in any earlier condition or use.*
2.23			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Clarity	**2.23 restoration** *alteration of a heritage resource which has decayed, been lost or damaged or is thought to have been inappropriately repaired or altered in the past to return it it's a previous design or appearance.*
2.24			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or	**2.24 reversibility** *work to a heritage resource carried out in such a way*

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			references Clarity & consistency	*that it can be reversed without causing any damage to its existing values.*
2.25			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	**2.25 setting** *surroundings in which the heritage resource is experienced.* NOTE Its *extent is not fixed and can change as the resource and its surrounding evolve.*
2.26			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Clarity Consistency See 2.29 below also	Delete
2.28			Emphasise protection of heritage values in the longer term, and for future generations, especially, as we cannot anticipate what values those future generations might bring to the heritage resources	*ability to respect and benefit from the values of existing heritage resources without compromising its ability to do so in the future.*
2.29			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Clarity Consistency	**2.29 value** *aspect of importance attached by people to qualities of places that include physical presence, attributes and associations and make a heritage resource important to society in cultural terms.*
3	Title		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references	**3 Heritage values**

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3.1	Title		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	**3.1 Role of values in the management of heritage resources**
	Content		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	*Heritage values represents a public interest, regardless of ownership. The planning system, and the policy and legislation which underpin it, reflect this public interest.* *Research into the heritage values of the heritage asset should be carried out.* *The protection of the heritage values ensures that decisions resulting in change are informed by a good understanding of the significance of a heritage resource.*
3.2	Title		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	**3.2 The assessment of heritage values**
3.2	Para 1		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency Clarity	*A wide range of factors can contribute to the value of a heritage resource. As well as physical components, value includes factors such as immediate and wider setting, use and associations (e.g. with a particular event, family, community, or artist and those involved in design and construction). The relative importance of the characteristics that combine to make up the heritage value of a resource vary.*
3.2	Paras 2 and		Reject and/or replace policy-biased and/or	*Examples of the characteristics that can be*

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	after		non-'UK Compliant' terminology and/or references Clarity Consistency	*considered in assessing heritage values are:* *a) attributes relating to the physical and spatial properties of a heritage resource* *(aesthetic, historic, cultural and evidential values):* *1) the design and how it has changed over time, including patina;* *2) the materials used in construction; and* *3) the survival of historical information in remains above and below ground (evidential);* *b) characteristics relating to the context of the heritage resource:* *1) how a heritage resource relates to its surroundings, for example, other buildings, townscape, landscape or the wider environment; and* *2) how a heritage resource relates to what we know of similar heritage resources, locally and/or nationally;* *c) characteristics relating to wider associations –* *(collective, associational values):* *1) the use of the heritage resource over time and its connections with a significant person, family or community;* *2) associations with historical, scientific or artistic events or works (such as literature or paintings); and* *3) social significance, and the historical, cultural, economic, political and social* *factors that influenced the design.*
3.3			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Clarity	**3.3 Understanding heritage resources and values** Understanding the contribution of a particular *heritage resource* to the wider historic environment allows decisions to be made in light of its *value as a resource*. There should be a presumption towards conserving significant heritage resources.

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			Consistency	How this is achieved should be site specific. Those responsible for the curation of a heritage resource can affect its continued benefit through actions to conserve or manage any changes. This could be achieved through conservation techniques, interventions or decisions affecting access. A thorough understanding of *the values of the heritage resource* is important prior to reconciling work proposals with the existing fabric, either by avoidance of harm, or where damage is unavoidable, by creating a record what was there.
3.4	Para 2	G	Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency Clarity	The attributes that combine to define the value of a heritage *resource* can relate to its physical properties or to its context. There are a variety of different ways in which *heritage values* can be expressed and communicated.
3.4	Para 2 contd		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	DELETE: Some United Kingdom heritage bodies have suggested that these fall into the following groups: a) *aesthetic value*, derived from ways in which people draw sensory and intellectual stimulation from a place, encompassing things purposely designed for that effect or not (e.g. the picturesque, the sublime); b) *communal value*, derived from the meanings of a place for people who relate to it in different ways, associations with social groups and individuals, this changes

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				over time; c) *evidential value*, derived from the potential of a place to yield evidence about the past (e.g. archaeology); and d) *historical value*, derived from the ability of a place to demonstrate or illustrate an aspect of the past or association with historic figure or event (a battlefield, memorial etc.).
3.4	Para 3		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency Omission or correction of key content and/or references and/or sources (Landscape/gardens)	One approach is to think of a heritage resource's value as comprising a list that might include: 1) Architectural, technological, natural (as in gardens) or built fabric value. 2) Townscape and/or landscape characteristics. 3) Spatial characteristics 4) Historical or evidential value. 5) Artistic value. 6) Economic value. 7) Educational value. 8) Recreational value. 9) Social or communal value. 10) Cultural value. 11) Religious value. 12) Spiritual value. 13) Ecological value. 14) Environmental value. 15) Commemorative value. 16) Inspirational value. 17) Identity or belonging. 18) National pride. 19) Symbolic or iconic value. 20) Associational value. 21) Panoramic value. 22) Scenic value.

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				23) Aesthetic value. **24) Material value**
3.4	Last paras		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Clarity Consistency	*The values of individual heritage resources* can also be influenced by their context or their value as part of larger collections or assemblages. Understanding *the values of a heritage resource* enables effective decision-making about its future.
4 & 4.1	Titles		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	***4 Using heritage value as a framework for managing the historic environment*** ***4.1 Understanding resource management – strategic and operational management***
4.1	Para 1		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	The management of a *heritage resource* occurs at two distinct levels, strategic management and day-to-day operational management. These can be given different labels.
4.1	Final para		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency Editorial	… *operational heritage resource management.* At both these levels *heritage values* should influence decision-making.
4.2	1-2		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	*age resources should be viably maintained for the benefit and enjoyment of current and future generations. The heritage asset's values should be the basis of the management and planning of its continued well-being. Its specific value and attributes, its setting, and inter-relationships should*

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				all form part of management planning. *Where management planning involves change to a heritage resource or its setting, the potential impact of that change should be identified and quantified. Impacts from change can be direct (affecting the fabric, attributes or character of the resource), or they can be indirect, (altering spatial qualities or relationships within the resource's setting).*
4.2	Para 2 last part		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency Clarity Practice standards	*Change that protects or reveals the heritage asset's values can be encouraged. Change that could cause harm to the values of the heritage resource should be avoided wherever possible.*
4.2	Para 3		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency Omission or correction of key content and/or references and/or sources: The term 'Conservation Management Plan' is a conflation of James Kerr's 'Conservation Plan' idea, and as Conservation Plans, Management Plans and Maintenance Plans are all separate and distinct types of document consideration should be given to defined them accordingly.	Proposed change should be assessed and its impact should be justified. The approach taken to that justification should be proportionate to the nature and values of the *heritage resource* and the scale and impact of the proposed works. For example, relatively minor alterations to a modest house might only need a simple statement to provide sufficient justification, while large scale interventions affecting a complex site might need a detailed plan or suite of plans covering conservation, management an maintenance. The information provided should be sufficient to ensure that the likely impact to the *heritage resource* can be assessed.

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4.2	Para 4		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	Work proposals should be based on an appropriate level of research into and investigation of the *heritage resource* in order to understand its values, structure, fabric, design, layout, services and other parameters. Where works are proposed to respond to or rectify problems with historic built fabric, investigation and research should be carried out to determine the cause of the problems and the available range of possible solutions. Solutions should be designed and executed in a manner that causes no harm or a minimal amount of amount of harm to the *heritage value of the resource* and avoids unnecessary loss of historic fabric. Generally, this entails the use of materials for repairs that match the existing closely, providing relevant issues of performance, durability and longevity have been considered. However occasionally, alternative approaches might be justified.
4.2	Para 5		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency Omission of key content and/or references and/or sources (Landscape/gardens): delete 'built' Omission of key content and/or	The principle of minimum intervention, that is retaining as much as possible of a *heritage resource's historic fabric* when repair or other intervention is required, is important. All interventions should be recorded to facilitate future understanding. Information learnt about the *heritage resource* during the planning and implementation of change should be properly recorded and made available for use by others. *Conservation, repair and maintenance of heritage resources should be overseen, managed and carried out by properly skilled and accredited specialists in*

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			references and/or sources: reference to skills and ethical frameworks	*their fields, working alone or in teams as required. They should have demonstrated considerable knowledge and understanding of conservation principles and legislation, observe a strict code of competencies and be able to operate proportionately, in line with principles of best practice, with experience and informed judgement.* *They should be able to avail of and utilise appropriate skills, materials and standards of workmanship. This might involve the application of traditional skills and material in place of modern techniques and standards.*
4.3	Title		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	***4.3 Other influences on the management of heritage resources***
4.3	Text		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency Omission of key content and/or references and/or sources: reference to maintaining a full record Addition to address imbalance between assessment of energy performance need for preservation.	Sustainable use of *heritage resources* is influenced by national and local economies, community interest and involvement, opportunities to benefit educational uses, health and well-being activities and facilities. The most effective way of ensuring energy efficiency and sustainability is to keep *heritage resources* in good repair so that they last as long as possible, do not need replacement and do not suffer from avoidable decay that would require energy and carbon to rectify. They should provide occupancy in an efficient manner involving minimal production of carbon and use of energy, *without harming significance or the physical performance of the historic fabric. This includes being managed in a way that suits the original*

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				performance characteristics of the building. Using natural ventilation and light, and proper temperature control for individual rooms, are good ways of minimising energy usage. This is better in principle than wasting energy (for example by keeping empty rooms warm) and resourcing this by local microgeneration. … The *heritage resource* should be regularly inspected (see **5.2**) and maintained (see **5.7** and Clause **6**). This is important to avoid damage from blocked drainage and ventilation. Works identified from inspections should be managed in a sustainable manner in a reasonable time frame. Sustainable management of *heritage resources* includes ongoing risk analysis for the hazards of fire and flood and to monitor measures put in place (e.g. warning or active systems) or the provision, checking and use of equipment and services. Many *heritage resources* with potentially vulnerable elements and contents that are highly significant would often require environmental control and monitoring systems in order to provide optimum environmental conditions and aid the management and conservation of *the heritage resource*. The resultant data should be regularly collected and analysed and a full record maintained. Where the data analysis indicates further conservation works or a change in environmental conditions is required, these should be implemented in a timely fashion.

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Contd			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	When the use of a *heritage resource* is changed it can result in changes to internal environmental conditions that have an adverse effect. … The economic sustainability of *heritage resources* can be vastly improved if they have a use that provides an income, (e.g. occupancy that provides an income, tourism, grant aid etc.). Economic sustainability should be balanced with other issues such as impact on *heritage values.*
4.3.2.			Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	Careful selection of materials for conservation works is important for *heritage resources. …* However sources should be verified to ensure this does not cause degradation of other *heritage resources* and to ensure that repairs are identifiable. ….
4.4	Para c.4-5		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	At one level, the content of the strategic plan is concerned with the management organization and its core activities, not about the *heritage resources* in its care. However, *heritage values* can shape the strategic goals that an organization sets for itself within a plan…
4.4	Last paras		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	c) other individuals and groups holding information about the organization's resources that is critical to shaping new policy Generally, *heritage values* influence b) and c).
4.5	Para 1		Reject and/or replace policy-biased and/or	A conservation management plan should be a

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			non-'UK Compliant' terminology and/or references Consistency	high level strategic document that defines what is valued about an individual *heritage resource* (or a group, series or portfolio of *heritage resources*) and presents coherent management policies to ensure that that value is retained during the plan period… This can have many management benefits in practice for the *heritage resource* management organization, but to retain clarity of analysis in this British Standard, strategic and operational management plans are treated as distinct components.
	Paras 2-3		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	Conservation management plans can be used for individual *heritage resources*, complete estates (including those of very mixed heritage resource content), and for historic areas exhibiting multiple property ownership (see also **5.6**). They can be an important document for strategic and day to day management of the *heritage resource*, estate or area, as well as providing a means for sensitive and sustainable change. … A conservation management plan builds on the premise that the value of a *heritage resource* cannot be protected through management unless the manager has a thorough understanding of what it is that is important and why.
4.5	Later paras		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	For 'asset' write resource and for 'significance' write 'value'

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4.6.1	Para 3		Omission of key content and/or references and/or sources: reference to the need for underpinning by historical statement	*a. An account of its evolution and development;*
4.6	All		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	For 'asset' write resource and for 'significance' write 'value'
4.7	All		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	For 'asset' write resource and for 'significance' write 'value'
4.7	Para 3		Omission of key content and/or references and/or sources: reference to architects	6) architects
4.8	All		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency	For 'asset' write resource and for 'significance' write 'value'
5		General	The current BS7913 contains a short statement about statutory protection. We think this should remain a feature of the Document	*5.xx Heritage resources may be subject to statutory legal protection by scheduling under ancient monuments legislation, by inclusion in a statutory list of buildings of special architectural or historical interest, or by inclusion in a conservation area under planning legislation. While this Guidance applies to all heritage resources, whether protected or not, what constitutes acceptable practice may be subject to statutory control.*

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5		General	We know there are many who wish to see the retention of the retention of paragraph 5.2 in the existing BS7913 in the revised version. While we can see that the general principles of this statement are covered in various places, we think the retention verbatim of the advice contained in it being clearly stated is advantageous.	*5.XX Application of standards and codes of practice* *Old buildings that have stood the test of time require judgement to be exercised when decisions are being made about their conservation. This judgement should be based on an understanding of principles informed by experience and knowledge, including that of relevant legislation. British Standards and other specifications and codes of practice should not be applied unthinkingly, in the context of building conservation. While the application of particular specifications, structural design codes and calculations can be appropriate in many circumstances, there can be other circumstances where it will be necessary to follow professional experience and judgement, on the basis of what has been proved to work.*
5	Titles and para 1		Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references Consistency Clarification of key content and/or references and/or sources):	***5 Using heritage values as part of operational care of property and other interventions*** ***5.1 Asset management as a part of heritage resource management*** *Heritage resources*, when property assets, are fundamentally different to other property assets in that with *heritage resources, heritage values* should be considered at every stage from the business strategy of the organization that owns or occupies the *heritage resource*.
5.1	Later paras			Asset management is the process by which property assets are managed so that they support business delivery of the organization that owns or occupy them. The asset management strategy identifies how this is to be done and the asset management plan puts this into practice.

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				Broadly speaking, the plan includes corporate responsibilities of the business and operational needs. However, where *property assets with heritage values* are concerned there are also heritage responsibilities. These should ideally be incorporated within a conservation management plan.

The asset management programme is produced in order to implement the *conservation management plan*. This should be updated throughout the process and cover property management (from individual asset to whole estate), operational projects, inspections and maintenance. It should also determine priorities (e.g. capital projects against maintenance) and is a long term activity ranging from three to more than ten years. The heritage value of the property asset is integrated via the heritage management processes.

Periodic inspection (see **5.2** and Annex A) is an important *part of the management programme* as from this, priorities can be determined and forward work plans produced. Forward work plans should comprise maintenance and projects. |
| 5.2 onwards | ALL | | Reject and/or replace policy-biased and/or non-'UK Compliant' terminology and/or references

Consistency
Clarity | For 'asset' write resource and for 'significance' write 'value' |
| 5.2 | Para 2 | | We think the omission of more than a passing reference to accreditation regimes, not least that provided by the IHBC, which is recognized by BRE and | See appendix for accreditation schemes |

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			PINS among others, is regrettable. Given the emphasis the revise BS7913 gives to its intended sphere of use, we think that the unqualified reader should be better signposted to the various accreditation schemes that exist for conservation professionals. This could be done by reference to an appendix. We think that an updating of BS7913 that fails to do this would be ignoring a major advance in the delivery of conservation practice that has evolved significantly over the past 15 years.	
5.10.1		General	We suggest that the commonest cause of dampness in historic fabric is the past inappropriate use of cement-based materials in floors, renders etc. and other unbreathable and impermeable fabric. We think this merits a specific mention.	The cause of any dampness should be analysed, this could be ground water, defective rainwater goods, leaking internal plumbing or drains etc. Dampness is often caused by the external ground levels being higher than the internal floor level. It might be possible to remedy this by improving the draining of the ground by a French drain or by creating a dry area or open trench, *subject to consideration of possible impacts on foundations.* Before any excavation is made in the vicinity of a heritage asset, archaeological advice should be obtained. *The commonest cause of dampness in historic buildings is due to the inappropriate use of non-breathable materials, such as cement, gypsum plaster, silicone sealants and waterproofing agents, silicone and acrylic caulking compounds, and plastic/acrylic emulsions and paints. Siliconate damp proofing chemicals and the injection damp proofing*

Clause/ Subclause	Paragraph Figure/ Table	Type of comment (General/ technical/editorial)	Comment (with rationale)	Proposed change
				process cause considerable damage to historic fabric. Concrete floors and plastic membranes and rigid foam insulation in roof structures, walls and beneath floors cause destructive dampness problems.
Bibliography		Technical	Omission of key reference	ICOMOS '*Guidelines for education and training in the conservation of monuments, ensembles and sites*', 1993