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Dear Sir

**Consultation on Canals and River Trust Listed Building Consent Orders
-Draft Conservation Management Methodology and Principles**

The Institute of Historic Building Conservation 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. We are very pleased to have the chance to comment on the consultation document.

The LBCO will offer joined up consistent management of the waterway heritage allowing the Canal and River Trust to manage its assets in line with the process and details listed and the IHBC hopes this will be a successful both for the protection of the canal heritage and as a wider exemplar.

Article 6 of the draft Order provides a review mechanism for the Secretary of State to assess where the objectives of the Order are being met and whether the Order remains appropriate. We hope that the Trust's level of, and commitment to, its professional heritage expertise would be duly taken into account as part of this review. In addition, the draft Conservation Management Methodology and Principles provide for an annual meeting every year between the Trust and Historic England to discuss the terms of the Order and its continuing fitness for purpose. We hope this will help ensure that standards are maintained. But the CRT will only be able to operate this trailblazing LBCO provided it maintains the professional expertise to do so, properly qualified, properly supported and trained, and well placed in the organisation. It is vital that the standing and quality of heritage professional expertise within the CRT structure is maintained and measures should be included to revoke the LBCO if this is not maintained. The level of skill

required in decisionmaking would require experienced conservation professionals. IHBC notes that nowhere in these documents is there a requirement for work to be carried out and overseen by people with appropriate professional qualifications and experience. It is especially important that the CRT heritage advisors are maintained at a suitable level with skilled and experienced conservation professionals. Maintaining appropriate levels of expertise will not only protect the heritage but will speed up handling and show the LBCO to be the national exemplar it should be.

IHBC believes for this system to work that CRT should always maintain a suitable level of professional advice within the organisation and that consideration might be given as to how this could be done and integrated into the organisation at the requisite level. IHBC wonders how the heritage qualifications and conservation skills content can be protected, maintained and ensured in the future within the Trust.

IHBC notes that 'associate membership' of IHBC is what is requested, but we suggest that this demonstrates that when the requirements were drawn up the level of heritage skills and experience needed was not well understood. Associate members could have a specialist area which does not cover that needed. Full Member would be a more suitable level to require.

The role of the trained conservation craftspeople also can be improved by ongoing training and accreditation and this should be built into the process.

The listed building consent granted under the terms of the draft Order is conditional upon agreeing a methodology and subsequently reporting the details of the works with Historic England. The agreed specifications or methods will be invaluable. For example the order refers to "Raking out of defective joints and re-pointing with mortar suited to host material". A sample specification for each of the likely scenarios to be encountered it would be most useful. It would indicate a standard and not rely on the word "suited". IHBC notes that nowhere in these documents is there a requirement for work to be planned and carried out according to BS7913 and wonders whether this could be built in?

The process in the flowchart requires advertising of proposed works, but we do feel that there should be consideration given to ensuring the wider notification of interested bodies or parties and to creating a simple feedback mechanism if issues or concerns arise.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Fiona Newton', written in a cursive style.

Fiona Newton
IHBC Operations Director