



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Good Practice Consultation
Historic England

By e-mail

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Dear Sirs

MAKING CHANGES TO HERITAGE ASSETS (HEAN 2)

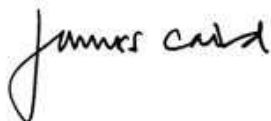
The Institute of Historic Building Conservation (IHBC) is the professional body for building conservation practitioners and historic environment experts working in England, Northern Ireland, Scotland and Wales, with connections to the Republic of Ireland. The Institute exists to establish, develop and maintain 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.

1. We are supportive of Historic England's intention to reissue Guidance in new series of documents and the intention to bring it up-to-date.
2. However, we do feel that much better can be achieved. The general trend appears to be towards generality and superficiality with some aspects of heritage (such as landscapes and gardens) hardly covered at all. English Heritage was instrumental in the preparation of much better guidance when the core policy was contained in PPG15. Where the current draft differs from the old approach too much is assumed, we fear, of the heritage owner and those who would contribute to schemes that affect it. Consequently, we think there is a need for much more comprehensive and nuts-and-bolt advice further down the line.
3. We think the opening paragraphs should have a reference somewhere that all works to heritage assets should undertaken on well-researched historic evidence and the support of a suitably qualified and experienced heritage professional.
4. The reference to the Disability Discrimination Act should be replaced with one to the Equalities Act 2010.
5. We are a uncomfortable with the statement in paragraph 3 "A reasonable and proportionate approach to all owners' needs is essential." We while we do not

disagree with this as such, we think it might give the impression that the current owner's "needs" are justifiable under any circumstances as concerns use and must always be accommodated somehow regardless of both the short term and long term impact on the building. We think this strays too far from the notion of the primary objective being the consideration of significance, and the statutory duty to have special regard to the preservation of special architectural and historic interest as clearly defined in the 1990 Act. In ecclesiastical cases the Statement of Need should always be balanced against the Statement of Significance.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large initial 'J'.

James Caird
Consultant Consultations Co-ordinator