



**Conservation Principles
Consultation**

Historic Environment Division
Department for Communities
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Consultations@ihbc.org.uk
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**Re: Consultation on Conservation Principles - Guidance for the
sustainable management of the historic environment in Northern
Ireland.**

Dear Sir/Madam

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 Institute's comments are as follows:

IHBC welcomes the guidance and notes that this is the first of two documents planned for publication, this one addressing principles and the second concerned with the application of principles. These documents will need to be underpinned by a robust legislative and policy context which would identify how the guidance fits within the existing hierarchy of government documents and should indicate what status documents have in determining impacts of proposed changes. Such a framework would strengthen the case for implementing the principles and guidance in practice in Northern Ireland in practice. Without a sound regulatory framework, the implementation and delivery of the conservation principles on the ground will be limited.

The introductory section would benefit from the insertion of a clear statement of status and purpose, indicating the functions of the document, its role and remit. This document does not have any reference to governance and accountability mechanisms for implementation, delivery and monitoring of the noted conservation principles. It does not provide clarity on who is legally responsible for implementation and delivery of the six identified conservation principles. There is no hierarchical flowchart on roles and responsibilities nor is there reference as to who will assess and determine the significance of a specific heritage asset. There is no clarity on who will verify the quality of any assessment of significance nor how to achieve the submission of such an assessment in practice.

The list of existing government strategy documents is incomplete and does not reflect the full range of NI strategies within which the historic Environment plays a vital role. In conjunction with a statutory framework a clear strategy for adequate financial investment into NI's Historic Environment Heritage Sector is required.

Principle 2 refers to passing on of special knowledge and skills but does not give any indication of how that is to be achieved. It also refers to the need for interventions to be by appropriately qualified persons and again there is no explanation concerning how this assessment will be made. The Department for Communities Historic Environment Division (HED) already defines what they see as **appropriate qualifications, experience, knowledge and skills** in the consultants framework that they establish on a four year cycle. They recognise and require that their consultants have recognised conservation accreditation. There is a strong case for explicitly setting out what they see as '**appropriate qualifications**' and where to find them. The IHBC is pleased to see the inclusion of its Conservation Professional Practice Principles in the documents referenced in Appendix A and this may help form the basis for establishing appropriate professional levels of knowledge and practice. There is a significant skills shortage across the historic Environment sector in NI at all levels from accredited professionals to skilled and experienced craftspeople. Effective historic environment management requires investment in providing these skills in the private sector and in statutory bodies. A skills review is needed to ensure sufficient levels of competency, skill and knowledge are available to the statutory agencies.

It is suggested that in relation to the additional interest described in the following terms: 'Authenticity interest - valued because it is unique and has an integrity', the word rare might be more appropriate than 'unique'. Also the concept of authenticity could be described separately from that of integrity. Authenticity being aspects that contribute to or enhance the values which might for example concern the form and design, the materials, the use and function, the traditions, techniques and management systems, the location and setting, some forms of intangible heritage, spirit of place

and other factors. Whereas 'integrity' is something different being the measure of wholeness or intactness of the values and may involve some consideration of whether or not there are already some adverse effects from development or neglect. It is noted that both authenticity and integrity are separately described in the glossary. Symbolic interest is wider than described in the sense that the 'communities' may be more extensive than 'local' ones.

Also 'Scientific interest' could perhaps also accommodate 'technological interest' as well.

The explanation concerning heritage assets of 'local importance' could be augmented because heritage assets of local importance contribute so much to the character of towns, villages and special places. They may not be rare or be statutorily protected but their contribution to the character of local places is critical and therefore their erosion would be regrettable.

The draft document does not acknowledge the inherent link between retention of existing historic built fabric, repair and reuse of existing structures and potential to meet set emissions targets. The need to protect, retain, maintain and repair existing built fabric, will enable the implementation and delivery of sustainable development at the local level and support the achievement of net-zero targets.

The section on Understanding Significance should be revised to provide a clear, succinct and logical approach to how the significance of a heritage asset is assessed.

Further devolution to local authorities maintaining a proper level of professional conservation specialists will enable sustainable management at the local level.

The need to introduce a sound regulatory framework to support the implementation and delivery of the conservation principles on the ground has already been referenced. The Statutory Planning Policy Statement is weak on the Historic Built Environment (archaeology and built heritage), and needs urgent review. There is no requirement for a Heritage Statement which might reflect the principles or values laid out in the draft document. The statutory requirement is for a Design and Access Statement to accompany applications for Listed Building Consent, which in practice can be very weak in the absence of guidance on qualitative consideration of heritage values.

Listing criteria should be revised to align better with the interest categories outlined in the Conservation Principles document.

Questions raised:

Q1: Are you responding to this consultation on behalf of an organisation or as an individual? Please specify organisation. IHBC

Q2: What connection do you/does your organisation have with heritage matters? See introductory paragraph

Q3: Do you agree with the overall approach to the Conservation Principles as outlined within its introduction?

Yes with slight modification.

Q4: Do you agree or disagree with each of the proposed six key principles and their associated aims on a scale of 1-5, 1 (strongly disagree), 2 (agree), 3 (neutral), 4 (agree) to 5 (strongly agree)?

Please provide any comments to explain your answer and indicate to which Principles (1-6) your comments refer.

These are all internationally accepted conservation principles for best practice. The draft guidance does not reflect the established ICOMOS Conservation Principles. The ICOMOS conservation principles approach to sustainable management accords with the NI Executives Programme for Government (PfG) 'Outcome-based approach' which puts a focus on achieving real world impacts on the Environment which the public have informed the government are important to them. The draft document also needs to clearly articulate the status of BS:7913:2013 Guide to the Conservation of Historic Environment, within NI. This is the UK recognised standard for all conservation works. Other professional standards should be referenced in terms of their status within NI.

Q5: Do you agree or disagree with the approach to Understanding Significance, and the three key interests of archaeological, architectural and historic? Most of the comments above mentioned relate to the section "understanding significance" and are about values.

Q6: Do you agree or disagree with the approach to Assessment of Significance? See main text

At present there is no legal requirement to request a Statement of Significance, Heritage Impact Assessment or Heritage Impact Statement nor any other specific historic environment assessment.

Q7: Do you agree or disagree with the approach to Managing Change to a Heritage Asset? (Please provide any comments to explain your answer) This is not controversial but the critical part will be in the next document concerning the application of the principles.

Q8: Is there any other comment you would like to make on the document content? Principle 2 refers to passing on of special knowledge and skills but

does not give any indication of how that is to be achieved. It also refers to the need for interventions to be by appropriately qualified persons and again there is no explanation concerning how this assessment will be made.

Q9: In responding to this consultation, please highlight any possible unintended consequences of the proposals and any practical difficulties you foresee in implementing them.

We await the next document on application of principles. However, without a sound regulatory framework, the implementation and delivery of conservation principles on the ground will be limited at best. To enable and sustain an enforceable conservation framework a robust statutory legislative system is required coupled with adequate financial investment to fund practical building conservation and also to support an adequate conservation skill base in statutory agencies and the private sector.

Yours sincerely,

Fiona Newton
IHBC Operations Director