



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Kaye Moxon
Cadw
Plas Nantgarw
Unit 5/7 Cefn Coed
Parc Nantgarw
Cardiff
CF15 7QQ

James Caird
Consultant Consultations Co-ordinator
IHBC Business Office
Jubilee House
High Street
Tisbury
Wiltshire
SP3 6HA

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Tel (01584) 876141
Web site www.ihbc.org.uk
E-mail consultations@ihbc.org.uk

Dear Ms Moxon

CONSERVATION PRINCIPLES, POLICIES AND GUIDANCE

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 further consultation. Our comments are as follows:

1. We are pleased to see the proposed revisions as we asked for inclusion of this content in our comments on the original draft. It is a bit difficult to comment on them as we do not know what alterations, if any, are proposed for the rest of the document, but we comment on the basis of what you have presented to us.
2. We like the subdivision of the section 'Understanding heritage values and assessing significance' into its components, subject to our comments below.
3. In our previous comments we asked for the utility value of heritage assets to be recognized in the Guidance. We think this is important because most heritage assets have modern-day economic and social uses both individually and collectively. This is bound to affect the interpretation of their significance and the treatment of this assessment is important. Ideally we would like to see this covered in a fifth subdivision of 'Heritage Values', but it should at least be expanded upon in the section on 'Communal value'.
4. We applaud the emphasis given to 'Evidential value' and the need (at paragraph 4) for a systematic approach. However, we think this misses one essential point: that evidence gathering should be done by appropriately qualified people. Whilst interpretation depends upon standpoint and is open to debate and change in emphasis over time, it is important that the nature of the evidence gathered is not

prejudged by a proposed interpretative standpoint. This means that proper professional standards should always be applied to the collection, analysis and recording of evidence.

5. We would like you to look again at the structure of paragraph 2.3 of the Principles. We do not disagree with this as a statement, but it is laid out with the primary headings of the 'Understanding heritage values and assessing significance' section rather lost in the text of the paragraph with greater emphasis given through layout to the list of areas encompassed. We think that the former should also be emphasized in a list with the existing list set out in a subsequent paragraph. We think this can be accomplished without running into a second page.

We hope these comments are useful.

Yours sincerely

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

James Caird
Consultant Consultations Co-ordinator