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**Dear Sir**

**Re: Welsh Government Consultation on Easy access to listed buildings in Wales**

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 this revision to update the guidance on provision of access to listed buildings revision to keep up to date. The content of the document will be assisted by the inclusion of photographs together with descriptions of examples of good practice in the provision of access to listed buildings. The text is useful and provides practical assistance and a methodology for a desirable approach to provision of access. At the same time it recognises the importance of having a well-informed understanding of the significance of a particular structure in the decisionmaking process.

The document is very largely focused on physical access but perhaps it should be made clearer that the document recognises that enjoyment of historic buildings by as many as possible involves an awareness of all access issues not just those with mobility needs. For example public buildings need to cater for those with

sight or hearing needs and for a range of intellectual needs but it is recognised that these can often be successfully addressed without significant alteration to the listed building. The document could explain that it concentrates on physical access as this is where the key challenges occur with regard to management of the historic environment.

On the fast facts page the 'but' in the following 'Access statements are good practice but must accompany some heritage impact statements for listed building consent.' Should it not be 'and' ?

### **In response to the 6 (no.) consultation questions posed:**

**Q1.** Do you agree that section 3 of the guidance clearly explains how an access plan can be used to balance easy access for everyone while protecting the special interest and conservation needs of a listed building? If not, please suggest how it could be improved.

**Response:** Yes Section 3 is clear. However we would suggest that at 3.1.1 the bullet point '*what would be a reasonable adjustment*' should be the last one not the 2nd one as it is hard to answer that question until the end.

**Q2.** Do you agree that the guidance will help service providers to meet their obligations to make reasonable adjustments for disabled people?

**Response:** Yes

**Q:** If not, how could it be improved?

**Response:** Not applicable

**Q3.** Do you agree that section 4 covers the most common solutions to improving access and adequately signposts the detailed guidance available from other sources?

**Response:** Yes

**Q** If not, where does it need to be enhanced?

**Response:** Not applicable

**Q4.** Please suggest examples of good practice in improving access in Welsh listed buildings that could be used to illustrate Easy access to listed buildings in Wales. (Provide address details, if possible.)

**Response:** No further comments

**Q5.** We would like to know your views on the effects that Easy access to listed buildings in Wales would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive

effects be increased, or negative effects be mitigated?

**Response:** No further comments

**Q6.** We have asked a number of specific questions. If you have any related issues that we have not specifically addressed, please raise them here.

**Response:** In section 3 there is a subsection titled 'The Conservation Assessment'. This is not a term generally used, and we wonder if it is, therefore, open to confusion? Could it instead say Heritage Assessment which is a more commonly used term? Otherwise no further comments

Yours sincerely

Fiona Newton

Institute of Historic Building Conservation