



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

Sustainable Buildings Division  
Communities and Local Government  
Floor 2, Zone H6  
Eland House  
Bressenden Place  
London  
SW1E 5DU

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](http://www.ihbc.org.uk)  
E-mail [consultations@ihbc.org.uk](mailto:consultations@ihbc.org.uk)

Dear Sirs

## **THE FUTURE OF BUILDING CONTROL**

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.

The Institute welcomes the opportunity to comment on the consultation. We support the review of Building Control and hope that it will lead to improved co-ordination of Building Control with Planning, Historic Building Conservation and the wider range of environmental issues including those arising from climate change.

The Institute has a number of specific comments on the proposals:

Proposal 1.3 deals with the integration of Building Control processes with Planning ones and therefore, presumably, Historic Building Conservation ones as well. We support the use of one-stop shops and adding Building Control to 1APPS. These are likely to lead to better understanding of the requirements of the planning and building control functions and reduce potential conflicts between them. Superficially they may create more work for specialist staff such as Conservation Officers, but we think this would be offset by fewer cases in which follow-up work is required.

Proposal 2.4 introduces the idea of "project guides". We support the production of these in principle and suggest that one for proposals involving listed buildings would be useful. Our only misgiving about this approach is that "one-size-fits-all" approaches to building work are not always appropriate and rarely so in the case of heritage property. So we would wish to see project guides promote ways of applying best practice rather than being pattern books to be copied slavishly. We think that a project guide for works to historic buildings that deals with the difficulties of altering historic fabric and mixing new and traditional materials, construction techniques, detailing and finishes would be beneficial.

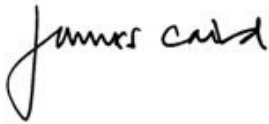
Proposal 2.5 proposes references to third party documents in Approved Documents. We strongly support this and suggest that references to technical documents relating to historic buildings would be useful. We would be happy to suggest relevant material in due course.

Proposals in Chapter 3 introduce the possibility new processes based on risk assessment. We support this in principle but would wish to see any new procedures involve early notification of impending works to ensure that proper advice can be given on the need for other approvals. This reinforces our support for the proposal to add Building Control to 1APPS.

Proposal 4.2 suggests that self-certification might be a way forward. We are not convinced of this. It seems to us that applicants will normally want the reassurance of official approval and those who do not may well be also be those who least well understand the implications of non-compliance.

Proposal 4.4 suggests a pattern book for deemed to satisfy measures. The Institute feels these could have useful benefits for new buildings but that they would be inappropriate for works to existing buildings, including historic ones, as discussed under Proposal 2.4 "project guides" above.

Yours faithfully

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

James Caird  
Consultant Consultations Co-ordinator