



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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Dear Mr Brown

HOUSING STANDARDS REVIEW

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 consultation. We wish only to make three comments.

1. There is no mention in the consultation of the applicability of the new standards being consulted upon to conversions of existing property. While many developments of this nature will be able to comply with new standards (and developers will, no doubt, wish to achieve what they can) the IHBC would not wish to see them overriding the well-established principles of conversion, restoration and maintenance of traditional buildings. We would therefore ask that explicit exemption be given from the full rigours of the Standards in these cases. A form of words such as that used in Approved Document B Part 1 and Part 2 (paragraphs 0.29 and 0.35 respectively) might be appropriate:

“Some variation of the provisions set out in this document may also be appropriate where Part B applies to existing buildings, particularly in buildings of special architectural or historic interest, where adherence to the guidance in this document might prove unduly restrictive. In such cases it would be appropriate to take into account a range of fire safety features, some of which are dealt with in this document, and some of which are not addressed in any detail, and to set these against an assessment of the hazard and risk peculiar to the particular case.”

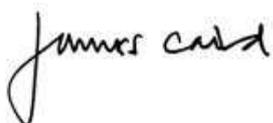
2. We also think that a similar provision should apply to proposals in World Heritage Sites and Conservation Areas and where the setting of listed buildings may be affected. In such cases adherence to the Standards should not be mandatory where this is necessary to comply with local design requirements under the Planning Acts or

conditions of Planning Permission or Listed Building Consent applied to a proposal by the Local Planning Authority.

3. There are already many cases in which the Building Regulations and British Standards and British Standard Codes of Practice do not agree. Any new standard should not add to this confusion. Option C would, therefore be our choice under Question 1 of the Consultation. We would hope that uncontroversial legislative change would be achievable in a relatively short timescale.

Other than this we have no comments of the Consultation.

Yours sincerely

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