



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

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Dear Mr Joyce

### **IMPROVING ENGAGEMENT BY STATUTORY AND NON-STATUTORY CONSULTEES**

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.

The Institute supports the proposed Code of Practice in particular the structured division of consultee concerns into categories with explanations of their seriousness:

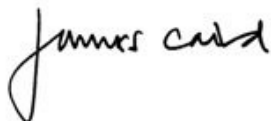
- fundamental concern;
- substantive concern;
- material consideration.

We think that, in relation to substantive concern and material consideration, consultees should be encouraged to suggest the action or condition that would overcome the concern. In relation to conditions this could, in appropriate circumstances, be by reference to a manual of standard conditions that already exists in relation to statutory interests in many areas.

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One aspect of the proposals we do have reservations about is the obligation of LPAs to ensure that decisions to refer (or not refer) applications to consultees should be taken by a suitably qualified person. Whilst this is the good practice adopted by many LPAs, it does have resource implications which also extend to any subsequent discussions. The Code of Practice refers to the obligation of consultees to provide sufficient resources to comply with the Code but no corresponding obligation for the LPA. The Institute thinks this should be addressed.

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