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Dear Sir

Consultation on The Maintenance and Repair of Traditional Farm Buildings: A guide to good practice

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: This guidance gives practical advice to farmers, land managers and others involved with the maintenance and repair of traditional farm buildings. As well as providing practical advice on maintenance and repairs it also explains how work of this kind can be considered in a wider context of sustainable management to ensure these buildings have a future.

Changes within this guidance emphasise the landscape and setting context of traditional farm buildings. The importance of having an informed approach to maintenance and repair is well explained as are the consequences of neglect or deterioration and that value can be compromised by neglect or unsympathetic repair. Other notable alterations from the 2011 version include the exclusion of the individual repair case studies. That information has been integrated

into the guidance sections dealing with building elements and finish materials.

Specific Comments on The Maintenance and Repair of Traditional Farm Buildings – A Guide to Good Practice.

There is overlap on repair aspects with the Adaption of Traditional Farm Buildings advices. At first it is not obvious that this advice document is aimed at retaining the status quo for existing farm buildings outside the spectrum of conversion and this needs to be made clear.

It is probably misleading to state that grants are available under the Countryside Stewardship Scheme. Certainly in the past this has been true but in times no such funding appears to have been available. With Brexit looming, and the withdrawal of European funding, it is further questionable as to whether any such funding might be available.

Page 20: The section on adaptation needs expanding and strengthening. In order to survive traditional farm buildings need a sustainable use.

In relation to assessing Heritage Professionals there are several passages where the advice is weak. For eg. Para 4.2 P31 Assessing condition where the text states ' Ideally a building professional experienced with older buildings and structures should carry out a careful survey to identify the most urgent needs for protection and repair. We suggest omit "Ideally" and add ' It is essential that etc' And then refer to the passage at the end of the document detailing the various accreditation schemes. We suggest you include IHBC accreditation amongst these.

We suggest that the idea that owners can refer to a local builder is also optimistic. Many of the problems in traditional buildings are caused by builders unfamiliar with the concept of breathability etc.

Para 4.2. The advice on ivy may need revision. Ivy does need to be cut off at base, allowed to wither and die completely, before any attempt is made to remove it from masonry or timber walls and the root treated with a glyphosphate (may need several attempts) taking steps to guard against introducing this salt into the masonry. Ivy does not appear to have the ability to throw out roots from severed limbs in order to regenerate.

Roof Coverings – Greater incentive in the face of building regulations is needed to retain vented torched roof claddings.

Discussion of creating a cold roof in order to retain this and other roof materials and features is needed here.

Thatch – It is questionable whether thatchers provide advice on the most suitable materials to use. Certainly in the South of England thatchers invariably recommend water reed in the face of their innate knowledge about the known vernacular use of long straw or combed wheat straw in the area they are familiar with. This is because they are dealing with a guaranteed source/supplier and do not have to rely on the vagaries of the British climate or the reluctance of DEFRA to sanction the growing of straw for thatch. Similarly thatchers can be very biased against the retention of historic roof construction components such as pole rafters (which sadly can be very worm eaten and not fit for purpose) and prefer to strip back to basic roof trusses and wall plate and work on a completely new rafter construction. This complete loss of historic fabric should be guarded against and detailed advice is needed here on how to avoid this. Furthermore building control officers declare that roof constructions even if only consolidated with a number of secondary components are tantamount to a new roof and must comply with the building regulations. This invokes further intervention and removal of historic fabric. All these eventualities must be considered and appropriate advice made available.

Floors- Knowledgeable specialist contractors are rarely available on building sites so when faced with say a lime-ash floor on the upper floor of a malthouse their inclination is to remove it forthwith. A section on the types of specialist floors that may be encountered and the way in which they should be repaired, is thus required, preferably in diagrammatic and photographic form (the latter so that they can be readily recognised by the uninitiated).

At Para 5.2 Wildlife, in relation to Bats some better advice would be helpful. Many local authorities now require a bat survey to register an application. In most cases this is unnecessary and can be conditioned. Its a needless cost (around £1,000) and really is only necessary (as for building regulations), should development proceed.

Page 53 last paragraph *'Sometimes hidden repair problems will only become apparent once 'opening up' works have begun. It is therefore a good idea to establish with the builder before work starts how any additional unbudgeted works will be costed. It is also sensible to allow a contingency sum in your own budget to allow for such problems''*

We suggest it might be better to frame this differently by stating that good practice would be to identify these areas and carry out pre-contract investigation works. Whilst it is best where possible to have information pre-construction, it is acknowledged that some unknowns can be unavoidable and therefore anticipation and planning for any such eventuality is a good backstop

Yours sincerely

A handwritten signature in black ink, appearing to be the initials 'JMG' or similar, written in a cursive style.

IHBC Operations Director