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Dear Sir

Consultation on the Quinquennial Inspection System

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 documents. The Institute's comments are as follows:

1. Commissioning of Quinquennial Inspection reports

1.1. It is important to recognise the increased number and expertise of accredited conservation practitioners distributed across the full and wide range of professional conservation accrediting bodies and organisations. These are peer reviewed accredited practitioners and numbers have been steadily growing through the various conservation accreditation schemes such as accredited IHBC members, accredited Icon members and schemes run by RICS, RIAS, AABC, CIAT, RIBA and CARE¹. It is therefore a significant concern that the draft

¹ IHBC refers to the intermediary source documents for these discussions, at <http://cotac.global/edinburghgroup/> and specifically the summary analysis

documents continue to maintain a longstanding emphasis only on the architectural and surveying professions. Concerns have already been raised that the church authorities could be open to concerns of constraint of trade; by narrowly limiting appointing *ARB registered architects and RICS chartered building surveyors* in the Scheme, and maintaining this approach is not appropriate given the available range of other professionals with relevant accredited competencies.

- 1.2. As a general observation IHBC suggests that it is unfortunate that the Inspection by an accredited conservation specialist is not extended to his/her being appointed as the church architect for any repairs or project work in the church.
- 1.3. It is unfortunate that the inspection of churchyard monuments (listed or otherwise) is still not specified as an actual requirement, but is merely in the wish list. Most church architects/surveyors, claiming the fee does not cover these, do not report on same.
- 1.4. The inspection of bell frames and running gear should also be a requirement (whether on the register or not).
- 1.5. Much of the consultation document is the setting out of current practice, and an interesting and sensible innovation is the suggestion that Parishes seek complementary reports - for the electrical installations, arboricultural, etc. in advance of the QI. This is an excellent practice.
- 1.6. IHBC welcomes the requirement for provision of a Statement of Significance in advance which is a useful approach.
- 1.7. The recommendation now acknowledges the sensible prioritising of works into 5 bands (plus one for maintenance) rather than the previous 4.
- 1.8. IHBC suggest that the reference to 'use of the ICOMOS Guidelines' on P10 be changed to "application of " or "compliance with" the..... ICOMOS Guidelines
- 1.9. In relation to the statement that it is important that a Quinquennial Inspector's training, accreditation and

at <http://cotac.global/resources/2-UK-Conservation-Accreditation-and-Membership-Schemes-for-Professionals-2016-Summary.pdf>

The Home Countries Protocol at <http://cotac.global/resources/4-Home-Countries-Accreditation-Requirements.pdf> also lists the wider context of such quality assurance frameworks.

experience in building conservation is commensurate with the complexity and significance of the church building(s) in question, it is suggested that the DAC will be able to give advice on this and will maintain a register of Inspectors currently working in the diocese. IHBC would like to better understand how the DAC will compile their list of suitable inspectors, whether or not there are criteria for inclusion and how does that process work? It would be helpful to know and understand this process because the PCC must seek approval as to the suitability of professionals appointed.

1.10. IHBC also notes that where HLF funding is sought tendering for services is required.

1.11. The costs of carrying out reports has risen.² IHBC recognises that many churches already struggle to pay their Diocesan quotas, and costs for reports are an additional burden, as a result many inspections are delayed to years 6 and 7. We wonder whether all DAC Secretaries have a reminder system in place and if not this might be a time and opportunity to instigate such a system.

1.12. The Guidance Note on 'Procurement' is welcomed, but with Historic England's removal from the grant awarding process, it is suggested that more emphasis might be placed on the Heritage Lottery Fund guidance. Also the FAQ is incorrect in stating that churches cannot appoint most architects/surveyors who are not accredited in conservation. They can, as the Grants for Places of Worship Scheme has been terminated.

2. The model Diocesan Scheme for the inspection of churches

2.1. IHBC have no observations about the Model "Diocesan Scheme for the Inspection of Churches" as set out.

3. The "Draft Quinquennial Inspection Report Template"

² Guidance was given in the guidance book published by the Church of England that:

Simple Churches: 5 - 6 hours (@ say £50/hour? £250 - £400)

Average Churches: 8 - 10 hours (say £400 - £500?)

Complex Churches: 10 - 15 hours (say £500 - £750?)

IHBC suggests that the current rates for those categories have in broad terms risen to around:

Simple Churches: £650 - £900

Average Churches: £900 - £1200

Complex Churches: £1200 - £1500

3.1. The template should include a general description of the church giving details of age, size, materials and at the beginning of the report. Certainly this should be in advance of "Evidence of the Presence of Bats" and "Ancient and Veteran Trees". There should also be guidance headings about that description.

We hope these remarks are of assistance,

Yours sincerely

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

IHBC Operations Director