



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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15 October 2012		Tel (01584) 876141
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Dear Sirs		
INFORMAL CONSULTATION ON SUSTAINABLE DEVELOPMENT INDICATORS		

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 notes from the responses to the previous consultation that there are a multitude of potential indicators not all of which can be represented in the final set. We are, however, particularly concerned that the opportunity has not been taken to include an indicator to represent the state of the historic environment (beyond its having a value as a component of physical infrastructure) despite the fact that there are several indicators representing the state of the natural environment. Bearing in mind the importance of the historic environment to people's sense of well-being and to UK tourism we think that this omission should be redressed with a supplementary indicator.

Previous attempts at indicators for the historic environment have tended to relate to administrative process which, in the context of the current proposals seems inappropriate. We note that several of the proposed indicators for the natural environment will rely on direct survey material. We think, therefore, that an indicator for the historic environment should follow this pattern.

We suggest, therefore, that a supplementary indicator, **listed buildings at risk**, should be added to the supplementary environment indicators. The basis for such an indicator is already in existence by virtue of surveys by English Heritage and local planning authorities but, like some of the other indicators, we expect that some work would be required to ensure comprehensive and consistent coverage, particularly in relation to the devolved administrations. We would be happy to assist with the development of this.

We envisage the indicator consisting of 4 sets of trend data:

- The total number of listed buildings at risk.
- New additions to the list.
- Removals from the list arising from restoration and remedial action.
- Removals from the list through demolition, delisting or other loss.

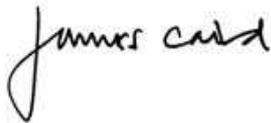
We think that such an indicator would be a bellwether for the historic environment as a whole in similar terms to the other environmental indicators.

We would also like to comment on the proposed indicator **5.2 Natural Resource Use**. We think the basis of this is misguided in two respects:

- The apparent exclusion of construction materials. This is counter-intuitive because construction requires high levels of primary resource some of which could be relieved by recycling and, importantly, reuse of existing built fabric. It also ignores the fact that most construction materials are also used in other industries and processes, and a full disaggregation of usages is probably impossible.
- It does not distinguish between renewable and non-renewable resources.

We would like to see this indicator reworked to address these points.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive, slightly slanted style.

James Caird
Consultant Consultations Co-ordinator