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Dear Sir

Consultation – Managing Heritage Assets: A Guide for Local Government

The Institute of Historic Building Conservation (IHBC) is the professional body for building conservation practitioners and historic environment experts working in England, Northern Ireland, Scotland and Wales, with connections to the Republic of Ireland. The Institute exists to establish, develop and maintain 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 of Managing Heritage Assets: A Guide for Local Government.

The document attempts to reinvigorate interest in heritage management by local authorities and ameliorate the downturn in conservation staff. It tries to set out the parameters in as clear and logical a way as possible. But it is a weighty subject that may be a challenge for local authority councillors and property professionals alike and which perhaps still needs more detail than has been provided here.

The Institute's comments on the Managing Heritage Assets document are:

1. It should make reference to BS 7913: 2013 Guide to the conservation of historic buildings, which contains considerable relevant guidance on asset management

2. It should better reflect the English Heritage advice on *Disposal of Heritage Assets: Guidance note for government departments and non-departmental public bodies* from May 2010, especially the clear advice on the alternatives to be considered before disposal, partnerships with the private sector and safeguarding heritage assets pending disposal. It is disappointing also that this valuable guidance is not included in the Further Reading on page 40. This may imply it has been superseded by this new document and if so, the new document is a step backwards
3. It contains little content about keeping vacant local authority heritage assets in a stable condition pending the often lengthy period of disposal. Nor does it cover the use of covenants or bonds to ensure satisfactory repair by third parties before the formal transfer of title
4. It does not reference Circular 06/03: Local Government Act 1972 General Disposal Consent (England) 2003, which allows councils to dispose of property valued under £2m for less than best consideration for environmental, social or economic benefit
5. It has a very broad-base and could include more detail if it is to address the serious difference to the decline of heritage assets through poor management.
6. It should include advice on preventing poor practices (such as the inappropriate use of concrete), ensuring the correct construction skills are used and underscoring breathability and the correct use of materials
7. It should explicitly remind local authorities that they are responsible for taking care of what is defined as BARS (Buildings at Risk) and therefore they should keep their own stock in good condition. There should be appropriate funding and policies that give priority to their responsibilities for compatible disposables for appropriate re-use
8. It should recognise that there might be other burdens on local authorities that could influence the management of heritage assets. In particular, property held through the Common Goods Fund, or those with restrictive covenants placed on a council as a result of a gift etc, should be a factor in effective management. Although not necessarily a fabric issue, it can influence an approach on use and especially disposal
9. It should make clear that early engagement with local authority in-house conservation professionals is vital, or if these don't exist then appropriate consultant input should be sought. Otherwise, the future of a building may only be considered by property officers and those holding a financial responsibility, with little regard for the building's 'optimum viable use'

10. It covers the same ground as the advice from the Prince's Regeneration Trust and Pillars of the Community listed in Further Reading. More work is needed on this new document so it can clearly be seen as "best practice", for which it needs a more precise focus
11. It is not as succinct as the 2003 guidance *Managing local authority heritage assets: Some guiding principles for decision-makers*
12. When final layout is done it should be noted that the six Diagnostic Templates at the end, which are grey with white writing, are in their current form difficult to read
13. The verse on page 14 is unnecessary and being so London-focused might confuse people of the geographical focus of the document and put them off.

Yours sincerely



Les Pickford
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