

*Submitted by email*

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21 December 2020

**Re: CIfA and CBA comment on LBC advice HEAN**

Dear Madam/Sir,

Thank you for the opportunity to provide comment on this HEAN on Listed Building Consent advice. We have confined our comments to the areas where archaeology is considered specifically. We have also commented on draft versions of this document via HEPRG and note with gratitude the various changes that have been made in response to our previous comments and the overall improvements to clarity and brevity.

Specific comments:

1. *Paragraph 21:* Although SMs and SMC are mentioned here SMC is not explained. It would be useful to either include a further paragraph describing SMC and LBC, or signpost relevant advice – particularly where a building or structure is both listed and scheduled, which should describe the precedence that SMC takes over LBC in these circumstances.
2. *Paragraph 29:* This paragraph is currently difficult to follow. We are aware that the wording of this paragraph closely follows a suggestion made by CIfA on a previous draft and we apologise introducing this confusion. We suggest the following revised wording:  

“Archaeological investigations extend in scope from desk-based assessments, which analyse existing sources and evidence, to detailed on-site investigation. These investigations provide or contribute to the analysis of heritage significance. The Statement of Heritage Significance may be part of the archaeological assessment, or, where the archaeological analysis is focussed on specific elements, it may form part of a wider Statement of Heritage Significance.”
3. Although mentioned in the appendix (p38) under drainage and (p44) rainwater goods, we feel that it would be useful to introduce a new paragraph in the main text to add a general statement about the potential for harm to the heritage assets that are not related to the building – eg those caused by underground works that are part of an LBC. Since these works will not necessarily require planning permission or SMC it would be useful to advise that an assessment of archaeological significance supporting an LBC should

consider this where relevant. This could be added after paragraph 16 or after paragraph 29.

If you require any further information, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Rob Lennox', written in a cursive style.

**Rob Lennox**

*BSc (Econ) MA PhD ACIfA MCIPR*

**Policy and Communications Advisor, ClfA**