

1	2	(3)	4	5	(6)	(7)
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Tim Howard / IfA	Guide to the conservation of heritage assets		ge	<p>1. The Institute for Archaeologists (IfA) welcomes this revision of BS 7913 and its attempt to recognise the '<i>movement away from fabric based and towards a broader set of values set around the concept of significance</i>' (section 0.9). Moreover, we appreciate that this is a first draft, not intended at present to represent a definitive Standard ready for publication.</p> <p>2. Nevertheless, IfA has a number of significant concerns with the draft Guide in its current form and would not support its publication without material changes to the draft. The Institute would be happy to continue the constructive dialogue in this regard with members of the BSI Committee.</p> <p>3. A fundamental concern is the scope of this draft Guide. Its title refers to 'heritage assets' and references often appear in the text to 'heritage assets' without any proviso. However, clause 1 of the draft Guide confines its scope to '<i>built heritage assets</i>' and states that '<i>[i]t is not applicable to below ground archaeology or any other type of heritage asset such as movable objects or vehicles.</i>' Furthermore, much of the text is directed towards buildings in the sense of a structure with</p>	See above.	

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				<p>roof and walls and is not easily applicable to other structures (such as above ground archaeological monuments).</p> <p>4. IfA wishes to see this Guide address the management and treatment of heritage assets generally (encompassing both above and below ground archaeological remains) and the text substantially revised to reflect this wider focus. Such a revision should include greater recognition of the need for a thorough understanding of the archaeological potential and historical significance of all assets, which can be arrived at only through appropriate archaeological methods. Such methods (and the sequential analysis which they involve) are applicable to assets both above and below ground.</p> <p>5. If, on the other hand, the Guide continues only to address above ground heritage assets, its title should be amended and the Guide should make clear whether it covers buildings, as narrowly defined, or structures, more generally. If the latter, the text needs to be revised to include wider consideration of structures.</p> <p>6. A further, major concern is the failure to identify standards in the Guide.</p>		

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				<p>Such standards already exist and the Guide should complement, rather than undermine, them. Where archaeological interest may be present, assessment or investigative work should be done by accredited practitioners in accordance with IfA Standards and guidance (http://www.archaeologists.net/codes/ifa). This would be the case whether the Guide applied solely to buildings or had a wider focus. The disregard of existing standards could undermine the quality of work currently achieved by reference to those standards. For this reason, without appropriate revision, IfA could not support the publication of this Guide, regardless of its intended scope.</p> <p>7. The Institute would also like to see clearer advice in the text on the sourcing of archaeological advice (including the use of accredited practitioners) and clearer guidance on the damage to archaeological interest caused by some building conservation techniques.</p> <p>8. The detailed comments which follow under specific sections develop some of these general concerns.</p>		
Tim	0.1	ge		1. The Introduction needs to be	See above.	

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Howard / IfA				<p>rewritten to cover a much wider (and older) range of assets if the Guide is to live up to its title rather than limit itself to building conservation, as the current text does.</p> <p>2. It is assumed that this Guide would apply generally to the United Kingdom.</p>		
Tim Howard / IfA	0.4		ge	<p>1. The first sentence refers to developments in mediaeval Britain, but when dealing with structures generally, much older influences are sometimes involved (such as the international cultural influences over ceremonial structures in Neolithic and later prehistory).</p>	Revise text.	
Tim Howard / IfA	0.9		ge	<p>1. The reference to English Heritage's <i>Conservation Principles</i> (2008) should be accompanied by a reference to Cadw's <i>Conservation Principles</i> (2011).</p>	Amend text accordingly.	
Tim Howard / IfA	1		ge	<p>1. A fundamental concern is the scope of this draft Guide. Its title refers to 'heritage assets' and references often appear in the text to 'heritage assets' without any proviso. However, clause 1 of the draft Guide confines its scope to '<i>built heritage assets</i>' and states that '[i]t is not applicable to below ground archaeology or</p>	See above.	

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				<p><i>any other type of heritage asset such as movable objects or vehicles.</i>' Furthermore, much of the text is directed towards buildings in the sense of a structure with roof and walls and is not easily applicable to other structures (such as above ground archaeological monuments).</p> <p>2. IfA wishes to see this Guide address the management and treatment of heritage assets generally (encompassing both above and below ground archaeological remains) and the text substantially revised to reflect this wider focus. Such a revision should include greater recognition of the need for a thorough understanding of the archaeological potential and historical significance of all assets, which can be arrived at only through appropriate archaeological methods. Such methods (and the sequential analysis which they involve) are applicable to assets both above and below ground.</p> <p>3. If, on the other hand, the Guide continues only to address above ground heritage assets, its title should be amended and the Guide should make clear whether it covers buildings, as narrowly defined, or structures, more generally. If the latter, the</p>		

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				text needs to be revised to include wider consideration of structures.		
Tim Howard / Institute for Archaeologists	2		ge	1. Although this is not a planning document, it is presumably hoped that the Guide will be used by those involved in planning-related work. Consequently, care should be taken to ensure that the definitions in the Guide are consistent with those in planning legislation, policy and guidance.	See above.	
Tim Howard / Institute for Archaeologists	2.5		ge	1. It would be helpful to clarify that these are ' <i>areas of special architectural or historic interest, the character and appearance of which is desirable to preserve and enhance</i> ' and <u>which are designated as such by a local authority.</u>	See above	
Tim Howard / Institute for Archaeologists	2.6		ge	1. Such a plan may relate to a group of heritage assets.	Revise text.	
Tim Howard / Institute	2.13		ge	1. The note which states ' <i>This is not related to age...</i> ' may be confusing to members of the public when seeking to	Revise text.	

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for Archaeologists				understand the definition of a historic building. Nonetheless, the note rightly makes clear that the definition is not related to statutory protection, which is helpful.		
Tim Howard / Institute for Archaeologists	2.26		ge	1. Compare the definition of significance in the <i>National Planning Policy Framework</i> (although the definition in the draft is closer to that in <i>Conservation Principles</i> (2008)).	Consider revision of text.	
Tim Howard / Institute for Archaeologists	3.3		ge	1. In the third line of the first paragraph, suggest replacing 'towards' with 'in favour of'. 2. In the last line of the second paragraph the word 'of' should be inserted between the words 'record' and 'what'.	See above.	
Tim Howard / Institute for Archaeologists	4.2		ge	1. The first / second lines of the second paragraph should refer to the ' <i>impact of change</i> ' <u>on significance...</u> 2. The discussion of ' <i>minor alterations</i> ' in the third paragraph should recognise that even minor alterations can have a considerable impact on archaeological evidence. 3. The reference to 'works' in the fourth paragraph should make clear that works should be carried out by accredited	See above.	

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				<p>persons working to professional standards. (In archaeology that includes Standards and guidance for desk-based assessment, for field evaluation and for the archaeological investigation and recording of standing buildings or structures. See http://www.archaeologists.net/codes/ifa.)</p> <p>The failure to deal with these issues in the draft Guide contrasts starkly with the draft <i>BS 42020 Biodiversity – Code of practice for planning and development</i> issued in July 2012. In the latter draft emphasis is placed upon '<i>professional ethics, conduct and judgement</i>' in order to '<i>give confidence that decisions/actions taken are correct and to reduce the potential for challenge</i>' (Note to Section 1: Professional practice).</p> <p>4. Draft BS 42020 defines '<i>professional</i>' at section 3.16 as follows:</p> <p style="padding-left: 40px;"><i>'person working in an occupation requiring special education, training and experience who provides professional services and is bound by a code of professional ethics or conduct'</i></p> <p style="padding-left: 40px;"><i>NOTE Professionals are normally required by their professional bodies to undertake continuing professional development (CPD) as a condition of membership in recognition of their</i></p>		

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				<p><i>professional responsibility to ensure that they are equipped with the most up-to-date knowledge and skill to discharge their roles effectively.'</i></p> <p>5. The Draft also requires relevant work to '<i>be carried out in accordance with an individual's applicable code of professional ethics or conduct. The code should be used not only as a source of ethical guidance but also as a common sense indicator to the principles of good practice that should be applied.</i>'</p> <p><i>NOTE Membership of a professional institute sets an individual apart from those persons who are not affiliated with such a body and who have not committed themselves to act in accordance with a professional code.'</i></p> <p>(section 4.1.1)</p> <p>6. IfA would like to see similar provisions in the current draft. (See also the comments under sections 5.2 and 6.4)</p> <p>7. The reference to recording in the final paragraph should be a reference to recording in accordance with professional standards. Where traditional skills and material are applied as envisaged in the last sentence of this paragraph, this should be in accordance with, not in place of, modern</p>		

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				standards.		
Tim Howard / Institute for Archaeologists	4.3.1		ge	<p>1. The second paragraph refers to the need to provide occupancy in an efficient manner. This overlooks the fact that not all heritage assets are suitable for occupancy (for example, structures such as kilns).</p> <p>2. The references to energy efficiency in the second and third paragraphs overlook the fact that not all structures need to be energy efficient (for example, town walls).</p> <p>3. The need for monitoring and analysis discussed in the fifth paragraph would include below ground archaeology if this were within the scope of the Guide (for instance, monitoring the hydrology of buried deposits).</p> <p>4. The reference to internal environmental conditions in the sixth paragraph presupposes that all standing assets have ‘internal conditions’.</p>	Revise text as appropriate.	
Tim Howard / Institute for Archaeologists	4.6.1		ge	<p>1. The second paragraph should make clear that area-based assessments may be used for areas whether they are designated or not.</p> <p>2. The matters identified in the</p>	Revise text as above.	

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ists				third paragraph as included in the scope of an appraisal should also include the origins and development of the area. Sub-paragraph e) should refer to ' <i>historic buildings, other sites of archaeological interest, green spaces and their settings.</i> '		
Tim Howard / Institute for Archaeologists	4.6.2		ge	1. In sub-paragraph d) of the penultimate paragraph heritage bodies such be listed along with civic societies and wildlife trusts.	Revise text as above.	
Tim Howard / Institute for Archaeologists	4.6.3		ge	1. This section should make clear references to relevant professional standards. Where archaeological work is involved this should be IfA Standards and guidance (http://www.archaeologists.net/codes/ifa). It should also indicate that work should be carried out by accredited, professional practitioners. Without clear references there is a risk that existing standards will be undermined.	See above.	
Tim Howard / Institute for	4.6.4		ge	1. This section should make clear references to relevant professional standards. Where archaeological work is involved this should be IfA Standards and	See above.	

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Archaeologists				guidance (http://www.archaeologists.net/codes/ifa). It should also indicate that work should be carried out by accredited, professional practitioners. Without clear references there is a risk that existing standards will be undermined.		
Tim Howard / Institute for Archaeologists	4.6.5	ge		1. This section should make clear references to relevant professional standards. Where archaeological work is involved this should be IfA Standards and guidance (http://www.archaeologists.net/codes/ifa). It should also indicate that work should be carried out by accredited, professional practitioners. Without clear references there is a risk that existing standards will be undermined.	See above	
Tim Howard / Institute for Archaeologists	4.6.6	ge		1. The introductory sentence under sub-paragraph e) should read: ' <u>this might include locally;</u> '	See above.	
Tim Howard / Institute	4.8.1	ge		1. Where archaeological interest is likely, such assessment should be carried out by an accredited practitioner in	Revise text as above.	

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for Archaeologists				accordance with the IfA Standard and guidance for historic environment desk-based assessment (http://www.archaeologists.net/codes/ifa).		
Tim Howard / Institute for Archaeologists	5.1		ge	1. The first line should read: <i>'Heritage assets are fundamentally different from other property assets ...'.</i>	See above.	
Tim Howard / Institute for Archaeologists	5.2		ge	1. The Note with regard to accreditation schemes should be expanded and include the importance of membership of a professional body (see above).	See above.	
Tim Howard / Institute for Archaeologists	5.3.1		ge	1. The reference in the second paragraph to ' <i>well understood techniques</i> ' may be appropriate for traditional buildings but is not always the case in respect of all structures (for instance, many prehistoric monuments).	Revise text.	
Tim Howard / Institute for Archaeolog	5.3.2		ge	1. This section would need to be expanded (for instance, to refer to taphonomic processes in the burial environment) if all heritage assets are to be addressed.	Revise text as appropriate.	

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ists						
Tim Howard / Institute for Archaeologists	5.3.5		ge	1. The penultimate line should read: ' <i>Too many data can lead to ...</i> '	Revise text as above.	
Tim Howard / Institute for Archaeologists	5.3.6.2		ge	1. For some archaeological sites their preservation depends on maintaining water ingress, rather than preventing it.	Revise text as appropriate.	
Tim Howard / Institute for Archaeologists	5.5		ge	1. In the second line the word 'fabric' should be inserted after 'historic'.	See above.	
Tim Howard / Institute for Archaeologists	5.8		ge	1. The first 'to' in the second sentence should be deleted. Moreover, although it may be appropriate to make repairs of a building only discernible to specialists, such an approach may not be appropriate when dealing with other, older structures.	Revise text as appropriate.	
Tim Howard /	5.10.1		ge	1. The reference to 'remedy' suggests that dampness is always	Revise text as appropriate.	

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Institute for Archaeologists				undesirable, which may not be the case with certain archaeological material. We welcome the reference to the need for archaeological advice before excavation, but would wish to see highlighted the need for such advice to be given by accredited, professional practitioners.		
Tim Howard / Institute for Archaeologists	5.10.5		ge	1. Mortar analysis is an important technique for phasing past structural alterations. Archaeological advice should be sought before raking out historic mortar.	Revise text as appropriate.	
Tim Howard / Institute for Archaeologists	5.11.1		ge	1. It is not necessarily true of the whole range of heritage assets that they are ' <i>mainly in productive use</i> '.	Revise text as appropriate.	
Tim Howard / Institute for Archaeologists	5.11.2		ge	1. It would be helpful here to make clear that furthering understanding of the significance of heritage assets is a benefit to society. 2. The text in this and the following section concentrates on urban development and fails adequately to address heritage assets in the rural landscape.	Revise text as appropriate.	

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Tim Howard / Institute for Archaeologists	5.13		ge	1. This section might helpfully refer to archaeological evidence.	See above.	
Tim Howard / Institute for Archaeologists	5.15		ge	1. This section concentrates on buildings (as narrowly defined) and needs to be broadened to deal also with other structures and, if appropriate, below ground archaeological remains.	Revise text as appropriate.	
Tim Howard / Institute for Archaeologists	5.17		ge	1. A further factor could be added to this list, namely: 'f) archaeological interest / evidential value of an asset's development that might be lost'.	See above.	
Tim Howard / Institute for Archaeologists	6.4		ge	1. Although the reference to the need for specialists in the type of work to be carried out on heritage assets is welcome, there needs to be clearer, more concise guidance on the need for work to be carried out by accredited professionals in accordance with professional standards (see the comments under 4.2 above). 2. The advice to avoid removal of historic fabric and patina wherever possible	Revise text as above.	

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				is appropriate, but the evidential value of such fabric and patina should also be noted.		
Tim Howard / Institute for Archaeologists	A.2		ge	1. Not only should the material identified under sub-paragraph c) ' <i>be valued and kept carefully and securely</i> ' but it should also be deposited in the HER if any investigative work is done.	Revise text as above.	
Tim Howard / Institute for Archaeologists	A.4		ge	1. The references in this section to inside / outside of a heritage asset and to room by room inspection presupposes a building and is not appropriate for other structures / below ground archaeology.	Revise text as appropriate.	
Tim Howard / Institute for Archaeologists	Bibliography		ge	1. The publications listed (with the possible exception of the Design Manual for Roads and Bridges) are not standards. The bibliography should, amongst other publications, list IfA Standards and guidance for historic environment desk-based assessment (2012), for archaeological field evaluation (2008), for archaeological excavation (2008) for the archaeological investigation and recording of standing buildings or structures (2008) for the collection, documentation, conservation and research of archaeological materials (2008) and for	Revise bibliography as appropriate.	

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				stewardship of the historic environment (2008) (see generally http://www.archaeologists.net/codes/ifa).		