



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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Dear Mr Clarke

DRAFT NATIONAL POLICY STATEMENT FOR ENERGY INFRASTRUCTURE

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 is generally supportive of the NPS as a whole and the section on historic environment in particular. We do however have a few detailed points in relation to section 4.23, which deals with the historic environment, we would like to be considered.

We note the very strong similarity between this section and the equivalent one in the NPS for Ports issued by DfT. Where there are differences (explained in this letter) we generally prefer the NPS Ports wording and would exhort you to use this for the reasons stated and for the need, where possible, for uniformity of wording and terminology within the sector.

The terminology used in section 4.23 follows that proposed in the CLG's draft PPS15 *Planning for the Historic Environment*. In principle the Institute supports this approach as understanding of historic environment matters can only be improved with a uniform use of terminology throughout the sector. However, we have been critical of the terminology proposed in draft PPS15 because it followed from that proposed in the Heritage Protection Bill which failed to get Parliamentary time last year and is now, seemingly, sidelined. Our criticism was that in its draft form the PPS used terminology that did not exist in the legislation currently in use and that it would make decision-making more difficult if the wording of statutory obligations on decision-makers were not used, or at least defined, in the PPS.

This is not so much a problem for NPS which operates under different legislation but we feel aligned terminology is a good objective. We suggest that you liaise with those in CLG who are redrafting PPS15 to achieve this as well as with DfT to whom we have commented in like manner.

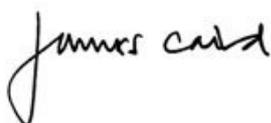
At paragraph 4.23.7, we support the assessments of historic assets within the framework of Environmental Statements and the reference to HERs as a basis for information on which to base such assessment. We think that in some cases the work of assessing significance may already have been undertaken or started in the form of Historic Landscape Assessment, Historic Area Assessment and Conservation Area Appraisal. Reference in a footnote to these techniques and the possibility that such material may exist within HERs would be useful as well as inclusion of more explanation in footnote 63 in line with that in the NPS on Ports.

Paragraph 4.23.10 starts "The IPC should not **approve** applications...". This should read "The IPC should not **accept** applications..." in line with the NPS for Ports. It is to the advantage of all that applications are complete before the details are circulated for comment and evaluation.

Whilst we consider the 7 paragraphs of advice to decision makers (4.23.11 - 4.23.17) to be well balanced, we note that it does not specifically refer to the incorporation of historic assets in developments which can be beneficial to both proposal and asset - e.g. St. Pancras Station. We think a sentence to encourage high standards of regeneration and development based on historic assets could be added to paragraph 4.23.13.

We are concerned about the wording of the third bullet point in paragraph 4.23.14. With its associated footnote this appears to create an artificial watershed between historic assets of "highest significance" and the rest. (The use of the word "including" in the footnote in the NPS for Ports version does not specifically exclude anything). We do not see any particular purpose in this point unless it is an attempt to downgrade the significance of (for example) Grade II listed buildings and conservation areas. Our preference would be for the words "of the highest significance" to be removed. Alternatively, the bullet point could be omitted altogether. The Institute believes that the significance of heritage assets should always be a matter for assessment on a case-by-case basis and not one for prejudgement by Government Circular. The previous two bullet points in paragraph 4.23.14 would achieve this without the third one.

Yours sincerely

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