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Making Heritage Work

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15 February 2013	Tel (01584) 876141
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Dear Ms Sofat	
REVIEW OF PLANNING PRACTICE GUIDANCE	

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. Our responses to the consultation questions are as follows:

1. Do you agree with the recommendations of the Review Group overall?

The IHBC agrees, broadly with the recommendations of the Review Group but we have some reservations about the practicality of the very short timescale proposed for its introduction, the absence of any specific long-term commitment to the necessary resources (which we think will be significant if the Resource is to be managed as proposed) and the way in which some valuable existing Guidance may be withdrawn before credible replacements are available.

2. Do you agree with the proposed recommendations for a much reduced set of essential practice guidance in the format recommended? (Recommendations 1, 2, 3, 5, 6)

Yes, the Institute supports these recommendations, in particular that the new resource should be:

- clear, up-to-date, and providing essential, coherent and easily accessible.
- a web-based live resource, hosted as a single suite of Guidance.

- actively managed to keep it current. We are a bit concerned about the recommendation that it should be understandable for all users. Whilst this is an admirable aim, material in the Resource should not be understandable by all at the expense of technical clarity.
- a fully integrated resource. We think that the proposals may underestimate the impact of ensuring that it remains properly indexed and, where necessary, cross-referenced. We think that this may prove more onerous than the Report acknowledges. We support the active use of feedback from users to achieve this, but would hope that this task would be kept absolutely up-to-date as back-tracking over days, weeks and months of suggestions and other points could prove a nightmare.
- reviewed following open consultation.

We also support the proposal to leave “best practice guidance” to specialist bodies with the proviso set out in the Review that this would be signposted from the new on-line Resource.

We think best practice guidance needs proper recognition as such as it would carry little weight in planning cases without this. We would hope that “signposting” from the new Resource would do more than just imply this. It is important, particularly in appeal and other high profile cases that the planning profession understands exactly what is reckoned to be “best practice” on a given topic and widespread consultation on this, including with expert consultees, is essential.

We are enthusiastic about being able to contribute to the preparation of best practice guidance whether collaboratively with other heritage interests or otherwise perhaps as an updated BS7913.

3. Do you agree that standards for future Government Planning Practice Guidance should be implemented by the Chief Planner in DCLG, but with decisions on what to include within guidance still taken by Ministers? (Recommendation 4)

Yes, but in order to be credible as a resource, Guidance needs to be properly consulted upon in order to ensure that all interested parties have had an opportunity to contribute. We would hope that this would apply to the new Resource and that the Resource would endorse a protocol for the process of producing best practice guidance.

4. While access to all planning guidance online will be free of charge, do you think it would be appropriate to offer planning professionals an additional service involving immediate notification of every revision to the guidance, and to make a small charge for this service? (Recommendation 6)

We have reservations about the charge. We think that notification should be available to all as *info4local* currently is. In fact this facility might be a ready-made platform for the proposed service and consequently not involve significant development costs.

5. Do you agree that the new web based resource should be clearly identified as the unique source of Government Planning Practice Guidance? (Recommendations 7-9)

Yes, we support this. We particularly support the subsuming of PINS guidance into the new Resource so as to ensure that parties at appeals have been working to the same Guidance from the inception of their proposal.

We also support the proposals for cross-Government guidance which should also apply to Government Agencies. It would be invidious if supposedly authoritative Guidance were to be undermined by Government Departments and Agencies with parallel responsibilities having their own separate standpoints.

6. Do you agree with the recommended timescales for cancellation of guidance and new/revised guidance being put in place? (Recommendations 10-13)

No, we do not agree with the timescales. We think they are far too ambitious to allow a credible on-line resource to be introduced. We would like to see the driving forces behind process being the quality and usefulness of the new Resource rather than a self-imposed deadline for the withdrawal of current advice.

The maintenance of an on-line database of credibility is a major task involving no little resource to achieve. If this is to be the Government's approach there needs to be a commitment to providing the resource to support it over the long term. Support must include updating of the resource as a whole whenever new or revised material is added including all the active links within it.

7. Do you agree with the recommendations for cancellation of existing guidance documents? Are there specific, essential elements of current guidance material that should in your view be retained and considered for inclusion in the revised guidance set? (Recommendations 14 - 16)

No, while we agree that existing guidance cannot be merely decanted into the new Resource, we are concerned at the precipitous approach to cancellation of old advice. It seems to us that the immediate cancellation of some items in Annex A will lead to Guidance vacuums as there are quite a few examples in Annex A in which cancellation is recommended against future replacement or absorption into other material. It is not clear from the Annexes why some material referred to in these terms is included here and not in Annex C. We think all Guidance should be retained until adequately replaced.

Specifically we highlight the importance of retaining the following:

- Annex A (57) Best practice guidance on Listed Building Prosecutions. While we agree that, as best practice guidance, this may not be a candidate for long-term retention, we think it is an essential tool to ensure LPAs deal with this sensitive area in a proper fashion. We would like to see it moved to the Annex C list until up-to-date best practice guidance is in place and can be signposted from the new Resource.
- Annex A (65) Section 215: Best Practice Guidance. Similarly we value this and think that environmental quality will be jeopardized if there is no available guidance. In particular the policy statements contained within this guidance need to be reiterated somewhere in the new Resource. We would like to see it moved to the Annex C list until up-to-date best practice guidance is in place and can be signposted from the new Resource.
- Annex C (31) PPS5 Historic Environment Practice Guide. We agree with this document's inclusion in the Annex C list but would not wish to see it withdrawn until English Heritage have completed the revision and republication of its non-planning and best practice elements.
- Annex C (40 and 71) Guidance on handling Heritage Applications. We support the retention of this in the list at Annex C.

- Annex C (63) Manual for Streets. This is a very important document relating to the maintenance of design standards in the public realm. The fact that it is advice to both planning and highway authorities (as well as developers and their designers) makes it all the more important for retention. We accept that the planning advice contained in it should be included in the new Resource, but because of its overall integrity and usefulness, we would not wish to see it withdrawn until up-to-date best practice guidance is in place and can be signposted from the new Resource.

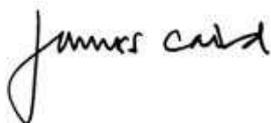
8. Do you agree with the recommended priority list for new/revised guidance? (Recommendations 17-18)

Yes, we support this.

9. Are there any further points you would like to make in response to the Review Group's Report? Do you have additional ideas to improve and/or streamline planning practice guidance?

We have no further points to add.

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