



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

Good Practice Consultations  
Historic England

By e-mail

James Caird  
Consultant Consultations Co-ordinator  
IHBC Business Office  
Jubilee House  
High Street  
Tisbury  
Wiltshire  
SP3 6HA

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Tel (01584) 876141  
Web site [www.ihbc.org.uk](http://www.ihbc.org.uk)  
E-mail [consultations@ihbc.org.uk](mailto:consultations@ihbc.org.uk)

Dear Sirs

### **CONSERVATION AREA DESIGNATION, APPRAISAL AND MANAGEMENT**

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.

Thank you for inviting us to participate in this consultation. Our comments are as follows:

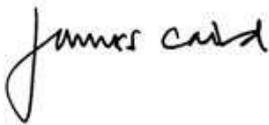
1. We applaud the approach in paragraphs 3 and 4 about the positive contribution conservation can have but feel that there are opportunities for reinforcing this in other parts of the document where the current tone might be said to be more emphatic of conservation as a constraint.
2. We are concerned that the document deals with conservation areas as though they are detached parts of the built environment. We think the document should be framed in a way that shows the wider context of conservation areas in the urban fabric. A paragraph at 4a should do this and would give a more balanced lead-in to paragraph 5. The topics that should be covered are:
  - Conservation areas in the wider urban fabric.
  - The contribution that conservation areas can bring to general sustainability and positive planning strategies for the wider community.
  - The contribution that CAs can make to local economies with the right economic and development strategies.
  - The involvement of the wider community.

3. The document overly concentrates on buildings. The focus of conservation areas should be one of urban character as a whole. Individual buildings are the building blocks of urban fabric, and they are the principle target for control because they are the main focus of ownership and its aspirations. Nevertheless, any advice document should make it clear that it is the contribution to the ensemble that is the most important factor.
4. We are not convinced by paragraph 7. LPAs have a statutory duty to consider which parts of their area should be conservation areas. This should be mentioned with any other mechanisms being contributory to the Statutory process. We do not understand the point about "previously misunderstood historic associations" and wonder why these words are necessary.
5. All the Statutory duties of LPAs in relation to conservation areas should be clearly set out somewhere in the document.
6. At paragraph 10 we think a further bullet point should add:
  - "Where the conservation area is in a setting that forms part of its architectural or historic character."
7. At paragraph 13, we are unhappy about the very limited way in which community involvement is dealt with; although we realise that further references occur, paragraph 25 for example. We think that, in line with the wider localism agenda, the document should promote community involvement in the widest possible way (including social, economic and environmental aspects) and at all times – identification, appraisal, designation and management. It is in the management of conservation areas that the resources of Local Authorities are often stretched and the promotion of community-led alternatives is imperative.
8. There should be a section of the role, formation and management of conservation area advisory committees (or their equivalent where other mechanisms exist) and the beneficial relationship they can have with LPAs. A paragraph on this used to form part of Circular 8/87 and later material.
9. We think that consideration should be given to the setting of the conservation area as part of the appraisal, not, as suggested at paragraph 16, as an afterthought at the designation stage.
10. We think paragraph 17 should be recast more generally to advise periodic boundary reviews. These should examine the case for including a wider area as well as excluding areas no longer of special interest.
11. At paragraph 19, we think the heading should be "Conservation area appraisal" and the usefulness of appraisal should be more firmly stated. We suggest:
  - "Character appraisal is a highly effective method of assessing an area's qualities prior to designation as a conservation area and in many post-designation processes: ...bullets..."
12. We think that there is a lack of a structured approach for conservation area appraisals. With the increasing dependence on civic and community organizations to effect this sort of work we do not think the broad-brush approach is appropriate. Anyone competent would be able to adopt an alternative approach if they deemed it appropriate.
13. At paragraph 20, we would prefer to have a more general statement about change. Say:

- "Designation as a conservation area does not protect against development. Indeed new development is usually crucial to a sustainable long-term future for the area. The resultant changes may affect the character, whether positively or negatively, and these need to be the subject of periodic reappraisal."
14. One of the most detrimental influences on the historic environment is road traffic. We think, therefore that traffic management should be added to the list of matters given at the end of paragraph 27.
  15. At paragraph 29 we think that the delineation of conservation areas on proposals maps is "essential" rather than "helpful". It is only by this mechanism that the relevant planning policy is applied to the conservation area.
  16. At paragraph 30, we agree with the reference to flexibility in the application of the building regulations. While we accept the need to future-proof the document, some of these are actually explicitly built into the Approved Documents at present. We think these should be referred to specifically, perhaps with the references in a footnote. Also the reference to the DDA is now obsolete. It should be the Equalities Act 2010.
  17. In the Appendix on conservation area appraisal we feel that Table 1 is inadequately reflective of the appraisal process, which is otherwise covered quite well. Perhaps this could be looked at.

We hope these comments are helpful.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large initial 'J'.

James Caird  
Consultant Consultations Co-ordinator