



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Historic England

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Dear Sirs

THE HISTORIC ENVIRONMENT AND SITE ALLOCATIONS IN LOCAL PLANS

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.

We are in two minds as to what we should say about this draft document.

1. As an *aide memoire* for experienced professional planners developing policies for Development Plans it is comprehensive and succinct and we applaud this.
2. However, while it represents a comprehensive check-list of matters which may need to be addressed, where to find the policy that governs them and the stages in the process, it gives no indication (as much former guidance used to do) on how this might be achieved. This places a great reliance on the qualifications and experience of the staff of individual planning authorities which, it has to be admitted, are stretched in the current straitened circumstances of many LPAs.

We accept that a full-blown Guide of the old school would be inappropriate in the Government's drive for slimmed-down planning guidance. But many development plans are short of readily available developable land. For this reason LPAs usually start the Local Plan process with a canvass for development land, and some are having to revisit the issue because their 5-year supply of immediately developable land is falling short of expectations. In addition land allocations are increasingly being made in neighbourhood plans. So the success of the Advice Note will be predicated upon the proposers of sites for development understanding the requirements for developments with HE implications and tailoring their proposals accordingly having obtained advice from appropriately

qualified and experienced advisers. Consequently, we think the Advice Note should say this in its opening paragraph.

We have a few specific comments which we hope will be helpful.

The first is an addition to paragraph 1.1 that reflects what we have just said in the second paragraph of (2) above.

*1.1 The purpose of this Historic England advice note is to support those involved in the Local Plan site allocation process in implementing historic environment legislation, the relevant policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG). **It is also intended to inform the proposers of sites for development (including those preparing neighbourhood plans) of the range of possible implications of their proposals for the historic environment (HE) and the factors that the Local Planning Authority (LPA) will take into account in making allocations of development land, to assist them in the formulation of their proposals...** In addition to these documents, this advice should be read in conjunction with the relevant Good Practice Advice and Historic England advice notes.*

We are not very happy with the last sentence of paragraph 1.1 as it would seem to be an invitation to ignore the advice being given. It is misleading because there are, as far as we are aware, no specified requirements for "approaches" in either legislation or national policy objectives. If a statement of this ilk is required (we would suggest it is not) we would prefer something on the lines of:

"...If an alternative approach is used it should produce evidence that is demonstrably compliant with legislation and national policy objectives as this Advice Note is designed to ensure.

We would like to see the rôle of specialist advice more tightly defined in paragraph 2.2:

"...advice from appropriately qualified and experienced specialists...".

We are a bit concerned that the main thrust of the document seems to be aimed at minimizing harm. We would like to see references to the regenerative power of conservation projects where the heritage asset is used as a focus or catalyst for change. We think that this is a positive aspect of conservation is under-represented in the NPPF despite that document's predominant emphasis on planning as a delivery vehicle for development. So we don't think that this omission from the NPPF should be a deterrent to inclusion in this Advice Note. We suggest:

*"2.1 ...The baseline information will help identify heritage assets **potentially affected by site allocations as well as sites where heritage assets can be the focus of or catalyst for regeneration.** Such desktop analysis may also identify gaps in the evidence base, where there may be a need to produce further information which will be needed in order to fully understand the potential impacts of potential site allocations on the historic environment..."*

3.1 ... (1st bullet) *"...sites for development including those which could enhance the historic environment **or be a focus for schemes of regeneration...**"*

3.2 ... (Step 1) (new 3rd bullet) ***"Consider whether there are heritage assets or historic areas that may be used as a focus of or catalyst to regenerative development."***

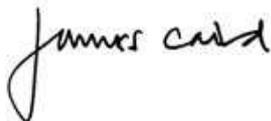
(Step 4) (new bullet in Maximising Enhancement column.) ***"Use of heritage as an approach to regeneration."***

The sort of baseline and desktop studies promoted by the Advice Note can result in new heritage assets being identified or greater significance ascribed to existing ones. We think this may happen increasingly as neighbourhood plans provide new dimensions to "significance" and that this should be reflected in the text. We suggest:

2.2 ... (second bullet) *"...The updating of existing information, or the production of a more detailed study on the significance of heritage assets, including assessment of their setting, or an assessment to understand heritage impacts in greater detail **or the identification of new heritage assets**".*

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, slightly slanted style.

James Caird
Consultant Consultations Co-ordinator