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Dear Geraint

IHBC Consultation: Historic England Historic Area Assessments guidance

The Institute of Historic Building Conservation 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 asking for our comments on the consultation document. The Institute's comments are as follows:

General comments

Primarily we think this guidance needs to emphasize that, as well as control and management in the historic environment, there are many positive aspects of conservation and its contribution to regeneration that should be highlighted in this guidance.

A key omission in this draft document is assessment of townscape quality, which of course is invariably a key component of conservation area character. And townscape is a characteristic that the planning system can preserve or enhance by law.

In order to be academically robust and useful, the document should provide a definition of a 'historic area' and should give an explanation of when a local authority or anyone else should carry out an appraisal along the lines suggested.

Presumably, a 'historic area' is any part of England that someone chooses to assess. It may not be politically wise to suggest that conservation practice seeks to protect everywhere. And given the current limited local government resources for conservation, it may make sense to concentrate on designated conservation areas and assessment of potential new conservation areas. We believe that less than 30% of Conservation Areas have appraisals and very few of those have been reviewed in a reasonable timeframe ("time-to-time" (S.71(1))) and only about 10% meet the Historic England Good Practice Standard. There are no resources for widespread area analysis beyond conservation areas, so there is no real need for the document to cover these. Perhaps the document should cross refer to the separate practice and guidance about urban and landscape characterisation studies about which no mention is made. It is unlikely that a Local Planning Authority not doing Conservation Area Appraisals is going to embark upon wider characterisation but the link might be well made.

The document makes passing references to Conservation Areas as if they are some minor component of a far more important bigger picture. Conservation areas are important because they are a statutory construct subject to statutory provisions. In terms of law and policy, non-designated areas are less important.

If the guidance is intended for use by local groups it is likely the lay person will find it impenetrable and heavy going. We suggest it may be better précised into a short snappy summary with cross-references to the more detailed sections for easier public use.

A clear dovetailing of this guidance with the statutory designation processes is missing. Related to this it would be helpful to remind audiences of the statutory requirement that LPA's periodically assess their areas to determine whether further parts should be designated as Conservation Areas.

Vague references to "planning circumstances" are unhelpful and should be omitted.

Specific comments

At 1.7, the term 'historic landscape' is used to describe built areas. This is not a term used by planners and other built-environment

professionals. The use of this terminology gives considerable scope for confusion. A more accurate term to use may be townscape.

At 2.2.2, the focus is on layout. There should also be recognition of the spatial characteristics of place, like enclosure and definition of spaces and streets. It might refer to the need to identify the three-dimensional qualities of an area in both its architectural character and townscape quality. This applies to 2.3.2 too.

2.3 refers to research questions, but does not provide explanation. This creates scope for confusion.

2.5.3 and 2.6.1 refers to the EH (HE) Conservation Principles. IHBC and other bodies have previously expressed concern that Conservation Principles do not work well with planning legislation. They are really designed to deal with archaeology. Planning legislation deals with 'special architectural or historic interest'. We have noted a general move away from Conservation Principles in all areas so the omission of this will help future proof the document. We suggest deleting references to Conservation Principles and replacing them with mention of the planning legislative framework and BS7913. The omission of any reference to BS7913 is unfortunate and should be rectified.

The table at 3.5.1 is rather simplistic and has questionable content. Suggest deletion or substantial rewriting.

At 4.1.1, there should be mention of urban design and townscape analysis skills. Also, far more emphasis should be placed on the importance of understanding planning legislation. Such understanding is crucial when developing a work methodology.

IHBC endorsement

We are aware that IHBC has supported the previous iteration of this document but we still have many issues which we feel could be taken into account in developing it. It may be we are able to support the final version but we are concerned we are being asked to support a document that may send out the wrong message.

We would feel happier if the existing Historic Areas document could be replaced with a thorough guidance document on conservation area character appraisal. This would support the statutory duties of sections 71 and 72 of the Planning (Listed Buildings & Conservation Areas) Act 1990 rather than the notion that everywhere is a historic area. This would be a wholly appropriate re-affirmation of the value of conservation areas, fifty years after the Civic Amenities Act 1967,

which was fought for so hard by Duncan Sandys and the Civic Trust.
This is a document we would like to see produced and might be
much happier to support and endorse.

Yours faithfully

A handwritten signature in black ink, appearing to be 'Fiona Newton', written in a cursive style.

Fiona Newton
IHBC Operations Director