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Dear Sir

Historic England Consultation Advice Note on Neighbourhood Planning and the Historic Environment

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.

We are very pleased to have the chance to comment on the consultation document. The Institute's comments are as follows:

IHBC considers that this advice note does not demonstrate a clear understanding of the neighbourhood planning process. We believe that it fails to address so many important points as to not be a usable piece of guidance in its current form. We suggest that the document needs to be rewritten and the overall structure reviewed. The note is probably too Historic England focused, it is too long, it fails to provide useful advice and it is weak on policy writing. The advice note reiterates a lot of material from other HE guidance which may not be necessary.

An important aspect in putting together a Neighbourhood Plan is to build and present the evidence base and use this in the development of vision, objectives and policies. Without this Examiners will not be convinced that the Neighbourhood Plan has been correctly prepared.

Those that take on Neighbourhood Planning for the first time have to understand a complex procedure of which the historic environment is one part. They can be deluged by advice and guidance on a wide range of issues so the message has to be clear, concise and easily accessible.

Any Neighbourhood Plan must meet the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. It is of note that there is only a passing reference to Strategic Environmental Assessment (SEA) which constitutes a fundamental omission. One of the basic conditions (condition 'f') for a neighbourhood plan is that it does not breach, and is otherwise compatible with, EU obligations. To meet this condition with regard to strategic environmental assessment (SEA), it is necessary to either make a statement of why a SEA is not required, or produce a scoping report indicating the findings of the SEA.

There is a really narrow focus on significance which is felt to be a major flaw. We would like to emphasize that there is very little in this advice note on building the evidence base outside of character and significance. There is very little on planning and no recognition of the planning values of heritage, outside of significance. The focus on significance obviously relates to buildings, but it is unclear how to apply this where several (sometimes hundreds) of heritage assets are concerned. There appears to be confusion here.

There is nothing in the advice note on how heritage relates to growth strategies in Neighbourhood Plans and the advice note contains no reference to viability. Nor is there anything in the advice note on the need to understand the land/property market.

Heritage decision making is complex, and for decisions to be led from the bottom up, the process needs to be fundamental driven by robust evidence. It needs to be emphasized in the advice that the most effective plans are those which are built from robust evidence¹. Evidence should lead decisions from the outset. Local laypeople will too easily make decisions based on their own circles of knowledge and taste. Without evidence, their opinions and judgements on value will remain too narrow and fail to properly

¹ St Ives NDP is a good example

serve public benefit. Furthermore, the evidence and the objectives need to be guided by experienced professionals.

Neighbourhood Plans have a great role to play in adding the detail which complements the more strategic based policies. Managing heritage effectively relies on attention to detail. Current austerity means Local Planning Authorities lack the resources to provide this attention to detail.

The advice note fails to promote heritage, to encourage people to care for heritage and to provide this attention to detail. It is wordy and too broad. It is repetitious, and structured without thought of the audience and with all the best most useful information at the end. It fails to clearly highlight the process that is needed for informing heritage management – investigation, evaluation, decision.

The section on community engagement is dealt with under evidence which is not appropriate as it is incredibly narrow in scope. There is nothing written about stakeholder engagement which is surprising and there is no recognition of the different types of engagement at different stages of the Neighbourhood Planning Process.

Understanding heritage significance is fundamentally about 'who values what and why'. In this context, local communities are very well placed to lead and inform decisions about how places are managed – however, they need excellent support. This advice note will complicate and confuse.

We suggest that Historic England should look at the advice note from the point of view of the user (lay or professional) and see how it fits in with advice from other agencies and interested parties. IHBC suggest that there is a lot more work to be done to make this advice note usable.

Yours sincerely

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

Fiona Newton
IHBC Operations Director