

## **THE COMMUNITIES AND LOCAL GOVERNMENT COMMITTEE**

### **External review of government planning practice guidance: Report submitted by Lord Taylor of Goss Moor**

#### **Memorandum by the Institute of Historic Building Conservation**

The IHBC is pleased to be able to contribute evidence to the Inquiry. Owing to the relatively short notice in the appeal for evidence we set out only the main threads of our view here. We shall be responding more fully to the parallel DCLG Consultation.

1. In principle we support the proposal to replace Government planning guidance with a single structured on-line resource.
2. 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.
3. 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" 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.
4. 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 Government would endorse a protocol for the process of producing best practice guidance.
5. We are enthusiastic about being able to contribute to the preparation of best practice guidance collaboratively whether collaboratively with other heritage interests or otherwise perhaps as an updated BS7913.
6. 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. 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 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.
8. 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 (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. In the long term it would, itself, be suitable for conversion to an on-line facility. 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 (40 and 71) Guidance on handling Heritage Applications. We support the retention of these in the list at Annex C.
9. There is one proposal in the Report that we feel we need specific advice on from relevant Authorities before coming to a recommendation on it:
- Annex A (39) Guidance on the Protection and Management of World Heritage Sites. This could be a candidate for inclusion in an on-line Heritage Resource in the long term. We think it relevant Authorities may find it useful in the meantime.

IHBC  
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