



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Practitioners Advisory Group

By e-mail

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30 June 2011

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Dear Sirs

NATIONAL PLANNING POLICY FRAMEWORK

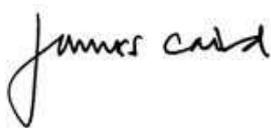
The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

We have seen the suggested draft for the NPPF prepared by the Practitioners Advisory Group. While we realize that this is not a formal consultation, we would like to comment on it with respect to the Historic Environment (HE).

1. We are aware of the Government's drive to reduce the length of National planning policy, but this objective does not always sit well with the tendency over the past few years of Development Plan policy to rely on National Policy on issues where there is wide consensus on policy objectives. This means that in some policy areas, there is a lack of clarity about how to weigh competing policy objectives.
2. We think that the present draft presents just this problem for HE and also contains very unfortunate shifts of balance (from PPS5) which will make it harder for LPAs to justify the conservation of heritage assets of significance.
3. The HE9.1 "presumption in favour of the conservation of designated heritage assets" and its emphasis on a greater presumption the more significant the asset has been altered to just "favouring" conservation.
4. Other policy omissions from PPS5 seem to include HE7.4, 7.5, HE9.1, 9.2(ii)(a-b), HE9.3, 9.4 and 9.6. Compared with PPS5 it loses the balanced judgement to be had between public benefit and loss of parts of the HE.

5. There is no recognition that the HE is everywhere and there is a spectrum of heritage assets from undesignated through locally designated to nationally designated.
6. Guidance on how to treat Grade II designated assets (their loss should be exceptional under PPS5) and 'less than substantial harm' (HE9.4) is absent. Both of these issues are of particular concern for local authorities;
7. The removal of Listed Building Consents and Conservation Area Consents from consideration in the NPPF, leaves them in a policy vacuum.
8. The level of Conservation Area protection does not reflect existing PPS5 levels. Buildings that make a positive contribution to a Conservation Area should be protected as a means of protecting the Conservation Area itself. As it stands Conservation Area protection appears to be at the level of undesignated heritage assets which is contrary to the aims of Conservation Area designation and a departure of current levels of protection.
9. It fails to emphasize the importance of finding new viable uses for usable heritage assets and the whole topic of conservation through regeneration. We think this will make it harder for developers to understand the subtle balance between these two fundamental planning concepts. Also relevant to this aspect is the reinforcement of regeneration by capitalizing on the conservation of historic existing land uses and townscapes, and the need for flexible approaches between the various regimes of statutory regulation.
10. The section on design derives substantially from PPS1 but has been truncated such that several important issues are inadequately covered. For example context no longer refers to local distinctiveness and, while the broad principles of urban design are outlined, the importance of this in the art of place-shaping is not adequately emphasized.
11. The draft is notably uniform in its overall approach and does not seem to recognize the enormous range on development pressures arising from the differing characteristics of places (e.g old v new, north v south etc.) for which subtlety of policy is everything. We think the importance of this may become even greater when the impacts of the Localism agenda begin to feed through into planning practice.
12. There is no recognition of the important role HE plays in delivering sustainable development through the inbuilt sustainability of historic settlements, the embodiment of energy in its fabric and its fundamental role in place-shaping.
13. The draft has lost some of the emphasis on a proportionate approach to protection and recording. Specifically, it omits the importance of developers being obliged to further understanding through the process of recording.
14. There is inadequate treatment of archaeological sites of national importance that are either not designated or non-designable.
15. Terminology should reflect the PPS5 terminology to avoid confusion as this is being widely used in DPDs and planning documents generally.

Yours faithfully

A handwritten signature in black ink, appearing to read "James Carr". The signature is written in a cursive, slightly slanted style.