



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

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Dear Mr Kent

## **PLANNING FOR A NATURAL AND HEALTHY ENVIRONMENT**

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.

Thank you for inviting us to participate in this consultation. Our comments on the proposed policies are as follows.

### **Plan-making policies**

#### **Policy NE1: Evidence base for plan-making**

There is no reference in the policy to landscapes below the level of national designations or, specifically, historic landscapes. The Institute thinks that these should be referred to in NE1.2(iii) as they can be significant contributors to natural character and biodiversity.

#### **Policy NE2: Regional planning approach**

The Institute has no comment on this policy.

#### **Policy NE3: Local planning approach for the natural environment**

The Institute supports the criteria-based approach in general, but wishes to see local designations retained where these are justified by the evidence.

Local landscape designations (like historic landscape characterization) are a simple way of setting out what is important in a particular area and (by implication) perhaps not so important in another area. Without such designations planning applications have to be assessed against criteria that apply to the whole plan area. To require every case to be

assessed against criteria when there is only sensitivity in some places is not appropriate and is potentially a waste of resources.

The Institute would therefore like to see the final sentence of NE3.3(ii) worded as follows:

NE3.3(ii) "...Local planning authorities should rigorously consider the justification for retaining existing local landscape designations, and they should only be maintained or, exceptionally, extended where it can be clearly shown that *the policy requirements for the area are distinct from the rest of the authority's area.*"

#### **Policy NE4: Local planning approach for green infrastructure**

Green open spaces and corridors can enhance, and be enhanced by, linkages to urban townscape, particularly historic townscapes. Examples of this are town squares and churchyards and canal-related townscape. The Institute feels this should be referred to in NE4.1(iii) "...urban fringe areas, *urban green spaces and urban open spaces generally including historic townscapes...* (iv)..."

#### **Policy NE5: Local planning approach to open space, sport, recreation and play**

The Institute has no comment on this policy.

#### **Policy NE6: Local planning approach to recreational rights of way**

The Institute has no comment on this policy.

#### **Policy NE7: Local planning approach to the undeveloped coast and coastal access**

The Institute supports this policy but notes that there is no reference to the historic environment which features strongly in many heritage coasts, often in close association with adjacent natural areas. Whilst the policy is about "undeveloped" coast, we feel that a word or two would be merited:

"NE7.1 Local planning authorities should maintain the natural character of the undeveloped coast, protecting and enhancing its distinctive landscapes, cultural, biodiversity,[and] geodiversity *and historic* interest. They should ..."

#### **Development Management policies**

#### **Policy NE8: Policy principles guiding the determination of applications in relation to the natural environment**

The Institute has no comment on this policy.

#### **Policy NE9: Policy principles relating to the maintenance of an adequate supply of open space, green infrastructure, sports, recreational and play facilities**

The Institute has no comment on this policy.

#### **Policy NE10: Policy principles guiding the determination of applications affecting playing fields**

The Institute has no comment on this policy.

**Policy NE11: The consideration of applications for floodlighting for sports and recreational facilities**

The Institute notes that this policy does not specifically refer to light pollution which can have an impact on historic areas at night as well as neighbourliness. We suggest a small addition:

NE11.1 (iv) whether conditions could be put in place to control the use of floodlights to an acceptable level *and whether the design of the installation minimizes light leakage beyond the limits of the facility.*

**Policy NE12: Proposals for sport and recreation requiring natural features and water**

The Institute supports the inclusion of the the word "heritage" in NE12.1(ii) but wonders whether the two examples given in relation to natural features (climbing and potholing) should be matched with examples attaching to water for balance (say swimming and boating)?

**Policy NE13: Sport and recreation provision in nationally designated areas**

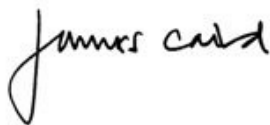
The Institute would like to see "heritage" added to the short list in NE13.2(ii).

**Policy NE14: Proposals for major sports development and mixed use sport and recreational facilities**

The Institute has no comment on this policy.

The Institute hopes these comments are of use.

Yours sincerely



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