



INSTITUTE OF HISTORIC BUILDING CONSERVATION

Heritage Protection Review
Architecture and Historic Environment Division
Department for Culture Media and Sport
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14 October 2005

Dear Sir

Revisions to Principles of Selection for Listing Buildings: Planning Policy Guidance Note 15

I refer to the above consultation document.

The Institute of Historic Building Conservation (IHBC) is the professional body for 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.

The Institute very much welcomes this consultation. The aim of the revised Principles of Selection, to provide clarity on the criteria applied when making list decisions, is long-awaited.

Q1 Does the revised approach to the Principles of Selection (i.e. general principles coupled with specific building types, underpinned by detailed technical essays) represent an improvement on the current PPG15 guidance, and make the listing process more transparent and simpler to understand?

The Institute strongly supports the need for better information and openness in the listing process. However, there is concern that the potential to complicate the listing process exists. A better and clear understanding of why buildings are considered to be important is essential in demonstrating rigour. The proposed revisions to the Principles of Selection go a considerable way to achieving this and are more likely to meet the aspirations of the Heritage Protection Review (HPR).

The purpose of the consultation is to revise the criteria against which buildings are listed, to ensure

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that the system for listing is as transparent and accountable as possible. The general principles set out in the revised Section 6.10 are clear, and provide an openness and flexibility to help gain an understanding of the listing system.

The additional Principle of Selection, State of Repair (new Section 6.10.5), acknowledges that the condition of a building is not a relevant consideration when deciding whether a building meets the test of special interest, and this is welcomed.

The proposed 'building summaries' provide an overview of the characteristics of 20 different building types. The summaries do reiterate the general principles, which could be considered unnecessary, and this could introduce confusion. However, reinforcing what it is that constitutes special architectural or historic interest broadly (using general principles) and then under particular building types, supported further by technical information is a good thing. It also offers those involved with historic assets levels of information.

It is the view of the Institute that the detailed Selection Guides, to be published by English Heritage, will provide useful guidance for owners of historic assets, applicants for designation, developers, architects, local authorities, the construction industry and the general public. The Selection Guides included in the consultation document in Annex 2 are practical and well written. It is, however, important that the more detailed technical information is research based. The guides should be viewed as working documents, updated in light of new research. This would enable a revision of the guides without the need to re-issue guidance in a Circular.

The Institute appreciates that since 1 April 2005, procedural elements of Section 6 of PPG 15 have been superseded with listing applications now being made to English Heritage. However, delaying a full review of PPGs 15 and 16 until the new heritage protection system is in place is frustrating. We would request that a programme of the Governments intention to review PPGs 15 and 16 be forthcoming.

Q2 Do the building types selected cover the field adequately and appropriately? If not, what changes would you suggest?

Attempting to list or mention every structure that would come under a particular building type is not feasible, and the Institute appreciates that with the best intention, there are likely to be omissions. However, building types/structures that do not appear to have been catered for in any of the categories include farmhouses and other 'non' country houses in rural areas. There does not appear to be any reference to bridges and tunnels. In addition, it is important to consider boundary walls, railings, gate piers, and steps where the main structure is not listed or has been demolished.

'Technological interest' is also a principle for listing that relates to a number of building types including Industrial Buildings, Transport and Utilities, and should be considered alongside special architectural or historic interest.

As noted in the new Section 6.11, limited importance should be given to the sequence of building types. It would be helpful if a similar statement was made about the bullet points used to describe the areas of special architectural or historic interest to avoid any confusion.

Further comments regarding the revised Principles of Selection are as follows:

When considering Group Value the importance of the relationship between the building and the townscape, landscape and archaeological setting should be recognised.

Regarding the date watersheds mentioned throughout the consultation document, there is perhaps an opportunity for such dates to relate to the chronology of development of the individual building types.

Consistency when analysing the special architectural or historic interest of the different building types is essential if such an approach is to be robust and transparent. 'Evidence of Evolution' is valued in suburban houses, but is not referred to in discussion of other building types. Similarly, 'Setting' is

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noted as being relevant to other building types, not just places of worship. 'Historic interest' should be included in the Principles of Selection for pre-1840 industrial buildings. It may be beneficial to identify such criteria in a more structured fashion.

A further point is that the document does not recognise the importance of early buildings designed by leading architects, who later did major works. Likewise, the importance of authorship relating to innovations in technology, construction or style, should be acknowledged.

I trust these comments are helpful.

Yours faithfully

Karen Holyoake
Consultations Secretary