

THE VICTORIAN SOCIETY

The national charity campaigning for the Victorian and Edwardian historic environment

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by email to: PPSHistoric-Environment@communities.gsi.gov.uk;
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Dear Mr Weatherby

Consultation paper on a new Planning Policy Statement 15: Planning for the Historic Environment

The Victorian Society is one of the national amenity societies referred to several times in PPG 15 and listed in Annex A of in that document. Founded in 1958, we are also members of Heritage Link and the Joint Committee of the National Amenity Societies who have also responded separately to the consultation. We also work very closely with historic environment professionals across England, so we commend to you as well the response of the Institute of Historic Building Conservation.

General points

We do not believe that the PPS in its current draft will meet the Government's objectives for the conservation and enhancement of the historic environment as set out in paragraph 5.

We believe that the draft PPS

- reduces the level of protection afforded heritage assets
- reinforces the misconception of heritage as a barrier to sustainable development
- misunderstands the notion of sustainable development as it applies to the historic environment
- introduces unfamiliar terminology which has no basis in existing legislation
- underestimates the level of resources needed for successful implementation
- places too much reliance on Historic Environment Records as sources of information
- makes inadequate provision for community engagement
- is underpinned by an inadequate Planning Practice Guide which needs substantial revision.

We have not commented separately on the Planning Practice Guide. We believe that a working group of experienced historic environment professionals should be established to help transform this into a useful document, with much greater consideration given to the needs of the end users.

1. Does the PPS strike the right balance between advocating the conservation of what is important and enabling change?

No. The tone of the document does little to convey the importance of the historic environment for its own sake, and lacks some of the robust wording we find in PPG 15. For example, while HE10.2 imagines that the loss of highly-graded heritage assets should be 'wholly exceptional', the sentence which is found preceding this in PPG 15 has been omitted, and so the context is much weakened without the recognition that 'There are many outstanding buildings for which it is in practice almost

inconceivable that consent for demolition would ever be granted.' The PPS would benefit greatly from an introduction which clearly set out the importance of conserving the historic environment, and a beefing up of HE10.1.

The justifications for the damage to or loss of heritage assets, HE 9.7 and HE 9.8, appear greatly to reduce the level of protection afforded to listed buildings, as all that seems to be required is, on balance, greater 'public benefits' (HE 9.7) or 'wider social, economic and environmental benefits' (HE 9.8iii). In PPG 15 there was the much better test of '*substantial* benefits for the community', and we would like to see the words 'substantial benefits' reinstated. There is a danger also that 'economic benefits', much less clearly spelled out here than in PPG 15, will be interpreted narrowly when experience shows us that economic cycles can be mere blips in the life of historic buildings.

The provision for protecting the setting of heritage assets in HE 9.6 is lamentably weak and is unlikely often to achieve the desired outcome: instead of 'where reasonably practicable', we believe that new developments should *always* be designed in a way that respects the setting of heritage assets. To allow otherwise seems completely out of alignment with the PPS's emphasis on sustainable development.

Overall there is little recognition of the wider benefits of the heritage as a social good in building stronger communities or its role as a catalyst for regeneration.

2. By adopting a single spectrum approach to historic assets, does the PPS take proper account of any differences between types of asset?

No. A particular weakness is that there is no mention of the importance of locally-identified heritage, and no encouragement to local authorities to designate it. Instead, there is a very broad spectrum of undesignated heritage assets covered by HE9, a range which is so extensive that owners will be uncertain whether or not they own a heritage asset, and potentially bring them into an unwelcome regulatory regime depending on the interpretation of the PPS by the local authority. The looseness necessary to apply to archaeological remains does not work well when applied to the built heritage. Does HE9.7-8 really give a local planning authority the opportunity to prohibit the demolition of a good but unlisted Victorian villa outside a conservation area, or the building of some new flats in its garden? We might like it to, but fear that it does not.

Greater emphasis needs to be placed on the importance of designated heritage assets, including Grade II-listed buildings. As currently worded, HE 10.2 will be taken by many to mean that Grade II-listed buildings are relatively unimportant.

7. Does the PPS strike the right balance between the objectives of conserving what is significant in the historic environment and mitigating the effects of climate change?

No. The Victorian Society is very strongly aware of the need to respond to climate change. Last year we held a special seminar at the QEII Conference Centre on *Greening your Victorian House*. However, the number of references to climate change seems excessive and possibly as the result of a mistaken belief that conserving the historic environment and mitigating climate change are incompatible. Energy use in buildings is only one aspect of sustainability, and the PPS's concentration on this is surprisingly old-fashioned. By contrast, the historic environment must score highly against the need for a low carbon economy: conservation of our historic environment promotes a respect for embodied energy, reducing landfill, recognition of the benefits of mixed uses and encouraging walking, and traditional construction materials with known long life-spans. We suggest that a more balanced approach is required.

8. Does the PPS make it clear to decision-makers what they should do? Are there any risks or benefits you would like to highlight for the historic environment sector?

The PPS adds a new layer of complexity in an already difficult system – exactly the opposite of what the government has intended. Without the apparently defunct Heritage Protection Bill, the new

vocabulary of significance has no grounding in legislation, and will create much confusion and uncertainty. Many in the sector are already very wary of the term, and the impenetrability of English Heritage's *Conservation Principles* has not done anything to help, especially as the document does not marry with the approach to significance in the PPS. Much more work needs to be done educating the historic environment sector and local authorities about what is meant by a significance-based approach.

Policy HE7 lacks any mention of the importance of consulting national amenity societies in pre-application discussions. Our experience is that developers' pre-application discussions with local authorities and English Heritage often prejudice the involvement of local people and amenity societies during the formal consultation period. CLG must try to remove this barrier to community involvement which is fundamentally undemocratic.

Indeed, the loss of other references to the national amenity societies is deeply worrying, and their invisibility in the new PPS will inevitably lead local authorities to assume that they now matter less, precisely at a time when the government is seeking to enhance community engagement in planning.

9. Information and evidence bases

The PPS places unjustified faith in Historic Environment Records, which often hold little useful information about the built environment. Even with the required investment it will be a very long time before they match other resources such as local history libraries and archives, record offices, museums, and specialist sources such as the National Monuments Record and the Royal Institute of British Architects library, for example.

Access to information is one thing, but ability to interpret historical records and to present useful statements of significance for heritage assets is another. There is already a shortage of qualified conservation staff within local authorities, and judgements about significance of the historic environment cannot be left to development control staff without professional training. We doubt that without improvement in local authority conservation expertise the benefits of such an approach will be realised.

We are very concerned that local authorities charge owners for access to information contained in Historic Environment Records as we believe this will work against the conservation of heritage assets: owners may feel that it is an additional burden and some will no doubt prefer to try to remain outside the system. Many owners contribute positively to the sustainability of heritage assets through the works they undertake, and deserve encouragement to understand the importance of the heritage assets in their care. This must benefit everyone in the long run and merits public financial support.

11. Impact assessment

The impact will be greater than calculated. Other consultation responses will no doubt reveal that the sector is less comfortable with the notion of significance than CLG and English Heritage expect, and so a substantial training effort will be required, including capacity building for community organisations which seem to be forgotten completely in the impact assessment. In emphasising the benefits of pre-application consultation the PPS takes no account of the additional burden that this will place on voluntary sector organisations such as the national amenity societies.

Yours sincerely

DR IAN DUNGAPELL