

Planning Policy Guidance 15

The publication in September 1994 of PPG 15 on 'Planning and the Historic Environment', notwithstanding the honourable line of succession from W. B. Yeats of Innisfree to A. H. Corner of Cockspur Street, was primarily a momentous event in the history of conservation rather than in the annals of English literature. But, as Malcolm Airs says below, it is highly readable and on occasion inspirational. For a departmentally sponsored document, with many shades of opinion to satisfy, and many years in the gestation, this is indeed remarkable. The long awaited guidance does not disappoint—all who are concerned with the conservation of the built heritage may take comfort from it. The three short contributions published here underline its significance: Malcolm Airs, who arranged a very successful course on the implications of the PPG at the Oxford University Department for Continuing Education in the spring of 1995, summarises its contribution; Neil Burton, who was responsible for the drafting of the new Guidance on Alterations, poetically known as Annex C, provides a critical history of the genesis of a crucially important appendix; and Sarah Pearson discusses the recording practice of RCHME in the light of this new government guidance.

Planning and the Historic Environment

by

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The framework for the protection of the historic environment in England into the next century was effectively set by the publication in September 1994 of *Planning Policy Guidance: Planning and the Historic Environment*, more succinctly known as PPG15. The product of a lengthy period of drafting and fierce negotiations it supersedes Circular 8/87 as the official expression of Government policies and attitudes towards conservation and generally it has been given a warm welcome by those actively involved in the field.

It is a measure of the weight that is now attached to 'enhancing the familiar and cherished local scene and sustaining the sense of local distinctiveness which is

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so important an aspect of the character and appearance of our towns, villages and countryside' that the document runs to sixty-four A4 pages of double columns including a comprehensive index. Moreover it is a tribute to the authors that the prose, which will have to withstand the close scrutiny of a whole generation of lawyers and other professionals searching for nuances of meaning, is highly readable and on occasion, inspirational. If W. B. Yeats really did write the Ancient Monuments Act of 1908,¹ then Hugh Corner of the Department of National Heritage can be proud of perpetuating an honourable literary tradition. The PPG is clearly written and embellished with several ringing phrases which will reverberate in appeal statements for many years to come. It is logically laid out, moving from the general to the particular through eight chapters which cover the planning system, development control, listed buildings, conservation areas, transport, recording, maintenance and ecclesiastical buildings, and it is complemented by four helpful annexes which gloss the legislation and the main heritage bodies, the bureaucratic procedures for control, detailed guidance on alterations and a useful bibliography.

In response to the growing sophistication of the conservation movement it is a much sharper and more focused document than 8/87, providing an admirably holistic view of the historic environment which embraces parks and gardens, battlefields and the wider historic landscape, as well as listed buildings and conservation areas. It is underpinned by the latest planning concepts including a commitment to sustainable development - here defined as a need not to sacrifice 'what future generations will value for the sake of short term and often illusory gains' - and an acknowledgement of the importance of defining environmental capacity for change and making full use of impact assessments. The more important legal decisions of recent years have been assimilated into clearer definitions of key issues such as fixtures and curtilage, 'preserve or enhance' and partial demolition. Even the potentially disastrous consequences of the decision on No. 1 Poultry is effectively neutralised by the statement 'that subjective claims for the architectural merits of proposed replacement buildings should not in themselves be held to justify the demolition of any listed building'. It would be illusory to suggest that these issues have been definitively settled but at least the ground rules have been clearly stated.

Many of the fears that were expressed after the publication of the draft document in July 1993 have been allayed by the revisions incorporated in the final version. The democratic process of public consultation could not have been better vindicated by some of these crucial changes. Most notably the overwhelming economic impetus of the draft has been tempered by the recognition in the very first paragraph of the published text that the historic environment should be valued and protected for its own sake and not merely as an adjunct to the financial importance of tourism. As might be expected in the current political climate, economic viability remains the core policy, but it is a policy that balances the consequences of change with the sensitivity of the buildings themselves and in the process emphasises the concept of compatibility. For the first time those who wish to initiate change are explicitly required to justify their proposals and to provide sufficient information to allow an informed judgement to be made. Indeed, the

need for assessment and relevant information is constantly re-iterated throughout the PPG and is likely to prove one of the more radical influences on the conservation profession if the guidance in the document is used to its fullest extent. The onus is placed on applicants and local authorities alike. The latter, for example, are given a pointed reminder of their obligation to justify the status of their conservation areas by detailed assessments of character, appearance and special interest as a basis for the foundation of their policies and the allocation of their resources. Crucially, the adequacy of their assessments will be a factor to be taken into account in considering appeals against the refusal of consent. The importance of understanding the heritage in the widest sense is further emphasised in the chapter devoted to identifying and recording the historic environment and is implicit in the advice on the necessity of attaching appropriate recording conditions where consent is granted for the alteration or demolition of listed buildings. This goes beyond the statutory obligation where demolition is involved to inform the Royal Commission on the Historical Monuments of England and introduces the concept of the 'polluter pays', first promoted in PPG16 (*Archaeology and Planning*, 1990). The result is likely to be an increase in the number of professional building recorders and an explosion in the number of records, although the questions of standards of recording and the destination and proper archiving of the records remain to be addressed.

The recognition that the protection of the historic environment is the responsibility of everyone and not simply the preserve of the planning authority is another major theme which runs throughout the PPG. The notion of stewardship is extended from central and local government to embrace business, voluntary bodies, churches and individual citizens as owners, users and visitors of historic buildings. Highway authorities in particular are counselled to exercise the greatest care in assessing the impact of their activities on the environment, but there is also sound advice aimed at those who are responsible for the fire and building regulations, access for the disabled and housing improvement grants.

Perhaps the one change from the draft document which will give most satisfaction to those who commented on it at that stage is the re-instatement of the presumption in favour of the preservation of listed buildings which first appeared in Circular 8/87 but which then fell foul of ministerial prejudice.² Not only does the phrase appear in an unequivocal form in the published PPG but it is strengthened by the introduction of a further presumption in favour of the retention of unlisted buildings which make a positive contribution to the character and appearance of a conservation area. More than anything else, that single change reflects the power of informed public opinion and gives cause for optimism for the future health of conservation in England. There can be little doubt that the potential for responsible stewardship of the historic environment is present in this enlightened publication. Its achievement however will depend on how far its ethos is accepted by those who operate the system at every level. The civil servants have done an excellent job. It is now up to us to make it work.

REFERENCES

1. *ACO News*, (August 1995), 7.
2. Sir George Young, 'A Plague on Presumptions!', *Housing and Planning Review*, (Dec 1991/Jan 1992).