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Emma Brown
Heritage Protection Review
Architecture and Historic Environment Division
Department for Culture, Media and Sport
2-4 Cockspur Street
LONDON
SW1Y 5DH

2005/39

17 October 2005

Dear Ms Brown

**REVISION TO PRINCIPLES OF SELECTION FOR LISTING BUILDINGS: PLANNING
POLICY GUIDANCE NOTE 15
Consultation paper – July 2005**

The Institute is pleased to have the opportunity to comment on the above consultation paper, read on the Department for Culture, Media and Sport website at www.culture.gov.uk/global/consultations/2005+current+consultations/revisions_to_principles_of_selection_for_listing.htm?

We have consulted our regional Branches in England, and the members of our Development Control Panel and Urban Design Network, as a result of which I can offer you the following brief comments.

GENERAL COMMENTS

1. The Institute recognises the importance of the historic environment in helping to create sustainable communities and looks forward to commenting on the Heritage Protection White Paper when it is published in 2006.

Chapter 3: Background to the consultation

2. *Paragraph 15:* We are broadly supportive of the wish to revise the principles of selection for listing buildings and to provide a better understanding of why an asset may be suitable for listing.

3. *Paragraph 17:* Perhaps “regional” should be added as an interest on the second line since the regional picture of listed buildings is a valuable one.
4. *Paragraph 22:* We support the intention to revise the *Principles of Selection* now. This will provide the opportunity to pilot them and make any necessary modifications following the proposed White Paper next year.
5. *Paragraph 31:* We also support the logic of delaying a revision of *PPGs 15 and 16* until the proposed changes in heritage protection have been put in place.

Chapter 5: The proposals – Revisions to Principles of Selection for Listing Buildings: PPG 15

6. The material provided here (from *page 13* onwards) is useful in providing a context for those considering listing buildings. The descriptions for recording the historic environment capture much of the feel created in the work of WG Hoskins, and in the Scott Report (1942) on landscape patterns. There could be a useful link to the much more recent work in regional volumes of the countryside character programme, produced by the Countryside Agency. *Paragraph 6.3* illustrates the way in which development control decisions can be integrated with other forms of protection of the historic environment – a holistic approach.
7. *Paragraph 6.10.4:* The general principles provide a helpful checklist, but it is important to also take account of the regional dimension. The text mentions this, but the sub-heading does not.
8. *Paragraph 6.10.5:* Care is needed over the issue of state of repair. The new regime should give no encouragement to the view that if a building is allowed to fall into a poor state of repair, listing can somehow be avoided
9. The building types – set out after *paragraph 6.11* - are comprehensive and useful as a checklist, but the general principles that emerge tend to be repetitive. Consideration might be given as to how this can be avoided in the published document.
10. The question of regional variation might be included. Certain types of buildings will be more important in areas where there are less of them than where they are more common. To some extent, therefore, a building's geographical location could have a bearing on whether or not it is listed.

Annex 2: Examples of selection guides for building types

11. The material examples are very helpful.

If any of the institute's comments require clarification or elaboration, please do not hesitate to contact me.

Yours sincerely,

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