



United Kingdom
National Commission for UNESCO

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30th October 2009

By email only PPSHistoric-Environment@communities.gsi.gov.uk

Dear Mr Weatherby

CONSULTATION ON PLANNING POLICY STATEMENT 15: PLANNING FOR THE HISTORIC ENVIRONMENT

The UK National Commission for UNESCO (UKNC) is pleased to have this opportunity to express its opinion on this planning policy statement.

UNESCO is unique in the UN system in operating through National Commissions in its Member States. Under the UNESCO Charter, National Commissions are tasked to advise their governments on all matters to do with UNESCO. The UKNC is an independent body working in partnership with Her Majesty's Government and in close collaboration with the UK Permanent Delegation to UNESCO in Paris. The principal objectives of the UKNC and terms of reference for the Culture Committee are appended to the end of this document for your information, but these include:

- to provide expert analysis, comment and advice as input to UK policy-making on key UNESCO programmes and issues;
- to bring to the attention of Government aspects of UK policy towards UNESCO or matters in which UNESCO has legitimate interest;
- To advise and work with HMG on UNESCO's cultural activities which have specific relevance to the UK including UNESCO requests and initiatives, Conventions, World Heritage Sites' matters, and cultural education.

1 Existing conditions

Planning policy guidance notes 15 and 16 have been successful tools in managing the historic environment through the planning process, which are now routinely accepted as part of that process. They have provided clarity of process and responsibility, and established a well-trying system for informing decisions in the planning process, and developing appropriate off-setting mitigation. There have been and are, however, issues of consistency of application across England, which is unfortunate. This draft PPS gives an opportunity to rectify those inconsistencies.

The existing guidance has also enabled a substantive increase in our knowledge and understanding of the historic environment, which is a positive benefit of the planning system which could be further developed.

2 Draft PPS15

The UKNC welcomes and supports the draft PPS15 overall. It is a positive step forward in protecting and managing the UK's very rich and diverse cultural heritage, and builds on the bedrock established by PPGs 15 and 16, whilst bringing it up to date and strengthening many aspects. Much of our heritage is of international significance, as well as of great importance to individual local communities, and we are pleased to note specific reference to World Heritage Sites in policy HE10.

We have always promoted a practicable and integrated approach to our heritage across Government and the sector. We are therefore particularly pleased to see policy which takes an integrated approach to all heritage assets, as we feel that this has been one of the weaknesses of current policy guidance.

The draft PPS15 articulates clearly key principles, including recognising the contribution that the historic environment and its components make to sustainable development. Ensuring that the historic environment - the dynamic place in which we all live and work – is at the heart of planning is critical in a good planning system.

We fully support the approach and clear principle of promoting greater understanding of assets, their significance and values in order to inform better management. Evidence-based decisions are critical in conservation and we welcome the recognition of the need for expert advice to properly inform decision-making which affects heritage assets. However we think that there are a number of modest amendments which could add strength to the PPS, particularly with regard to World Heritage Sites and assessment of significance.

3 Areas for improvement

We are clear in our support the draft PPS15 overall. However, we feel there are some weaker areas.

3.1 English Heritage accompanying guidance

We are very disappointed with the accompanying English Heritage draft guidance generally. It appears disjointed and clumsy and as far as we can determine lacking in reference to World Heritage Sites. We find this curious, given that there is a DCLG and DCMS Planning Circular (July 2009) and accompanying English Heritage Guidance Note. We would strongly commend a thorough and robust revision of the EH guidance. But we would not wish this to delay the issue of PPS15 itself.

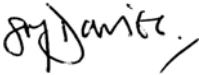
3.2 PPS15 Improvements

- Policy HE10.4 and 10.5: we feel would benefit from including the phrase ‘Outstanding Universal Value’ (OUV) with regard to World Heritage Sites. Planning assessments need to consider the attributes which contribute to the OUV; these attributes (tangible and intangible) are in effect the baseline data against which impacts are measured. Given that WHS are *de facto* of global importance, it would be preferable to acknowledge the terminology in the planning policy statement. In general, however, we support the statements on the relative contribution (or not) of specific elements to OUV [and significance] in HE10.4 and 5.
- For information, ICOMOS (Paris), advisor on the 1972 UNESCO Convention to the World Heritage Committee, is currently drafting a guidance note on heritage impact assessments for cultural world heritage sites. This will provide guidance on putting in place a defensible system for assessing/evaluating impact. Any such system must be capable of answering the questions about presence and significance that are being asked. The guidance is likely to be published early next year.
- We recommend including a footnote to policy HE 10 on the DCLG and DCMS Planning Circular (July 2009) and accompanying English Heritage Guidance Note
- We support significance-based assessment as a principle, but significance is subjective and perceptions change through time – significance is fixed by the predilections of the observer in the here-and-now. Some means of future-proofing decisions taken about significance taken in the present should be considered.
- We would like to see clearer statements on how the proper management of all aspects of the historic environment has a major role in adapting to climate change and its mitigation.
- Explicit reference to the UK Government’s high-level marine objectives (‘Our Seas – a Shared Resource’) and to PPS on Planning and Coastal Change is important. The draft lacks clear definition of the relationship between this PPS and the coast, coastal planning and marine planning.

- We would urge consideration of a clear statement of this principle of the desirability of conserving assets *in situ* in this PPS, as it is in effect the starting point.
- The PPS needs to be clear that the developer/applicant is required to procure the evidence on which the applications are assessed (HE9.1). The introduction, para. 5, is not clear and could be interpreted as access but not resources.
- Finally we would like to see an explicit and robust public benefit policy requiring proper provision for public participation and access to data and information arising from planning-related work. This seems to us to be a reasonable requirement which should be clearly set out in the PPS, and one which would bring benefits of improved understanding and support for our common heritage.

Finally, we urge Government to expedite the issue of the PPS. Given the lack of a Heritage Protection Bill this planning policy takes on an added significance in ensuring the management of the historic environment is at the heart of the planning system in England, in line with Government's stated vision and objectives.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sue Davies' with a flourish at the end.

Sue Davies OBE, FSA, HonMifA
Chair, Culture Committee
UK National Commission for UNESCO



United Nations Educational,
Scientific and Cultural Organization

United Kingdom National Commission for UNESCO

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CULTURE COMMITTEE

Terms of Reference

1. To be the formal link between civil society, relevant departments in Her Majesty's Government (primarily the Department for Culture, Media & Sport) including the Devolved Administrations and UNESCO on matters relating to all aspects of culture. Specifically, to co-ordinate civil society's culture-sector contribution to the biennial UNESCO general conferences, UNESCO conventions, and to UK policy on UNESCO's programme in the culture sector.
2. To promote recognition and awareness of and participation in UNESCO's cultural work, and to promote the work of UNESCO as an organization where all countries can learn from each other.
3. To participate, as appropriate, in UNESCO's early development of initiatives for cultural activities.
4. To advise and work with HMG, particularly the Department for Culture, Media & Sport, on UNESCO's cultural activities which have specific relevance to the UK (including the Devolved Administrations), including UNESCO requests and initiatives, Conventions, World Heritage Sites' matters, and cultural education.
5. To provide independent and expert analysis, comment and advice to HMG on cultural matters relating to UNESCO, including as input to UK (including the Devolved Administrations) policy-making on key UNESCO programmes and cultural issues.
6. To advise HMG on ways of raising awareness of UNESCO's cultural work in the UK across the whole of civil society, but in particular in the UK culture sector.
7. To encourage and facilitate the use of UK cultural expertise around the world, especially within developing countries.
8. To establish links with other National Commission Culture Committees of UNESCO Member States, to share and receive appropriate knowledge and research.
9. To undertake such actions as would enhance culture internationally.

26 August 2005