

An advisory Council to the  
Department of the Environment

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Chairman

9 – 7 – 2010

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Dear Manus,

Thank you for the opportunity to comment on *Criteria for Listing, A consultation on proposed revisions to: Annex C of Planning Policy Statement 6.*

The Historic Monuments Council recognises that there is no intention at this time to change the underlying legislation and that the key aim of the review and the proposal is to improve public understanding while ensuring that the legislation remains correctly interpreted.

Council welcomes the proposal that the internal 'Criteria for Listing' in an expanded and clarified form should be incorporated in the 'Principles of Selection' of Annex C, PPS 6, the additional historic criteria which are in line with the purpose of the review of improving public understanding, the greater recognition of the importance of group value to an assessment and the proposal that the Northern Ireland Buildings Database will become the sole source for detailed description of listed buildings and explanatory information.

### **Section 3. Proposals**

C4

In referring to statutory criteria under C4 the relevant article – 42(1) of the Planning (NI) Order 1991 – is stated. But the explanatory paragraph below it takes a different word.

The Historic Monuments Council would recommend that the relevant sentence should read....*The key criteria for listing are therefore, architectural interest or historic interest ....*

This would be consistent with Article 42(1) and also with the text that follows the sentence.

C5

Care should be taken here that the wording is consistent with Article 42(1) and C4. Is C5 necessary in the context of C4 and C6 and C7, as the latter clarify what is meant by the key criteria of **Architectural interest** and **Historic Interest**?

## Section 4. Consultation questions on the criteria for Listing

### 4.1

#### **Q1 Do you think that the combination of the 'principles of selection' with the 'listing criteria' will help to improve public understanding about the listing process?**

The Historic Monuments Council agrees this combination will improve public understanding of the listing process. It would be useful to give further attention to the terminology used in the relevant text to make it more accessible to the public.

#### **Q2 Do you think that the extra criteria in regard to historic interest are sufficient and clear?**

The Council is of the opinion that the extra criteria are sufficient. It is important that the terminology used is clear and comprehensive and consistent from point to point.

#### **Q3 The revised criteria point out that decisions can only be taken based upon the legislative requirements (C23) and that condition and future use are not an issue. This is often an issue of contention with owners. Have you any comment to make on this paragraph?**

The Historic Monuments Council is of the opinion that the paragraph accompanying C23 (p.15) is clear and Council agrees with the paragraph.

#### **Q4 Do you agree with the view that thematic essays should not be produced to supplement this policy?**

Since the key aim of the review and the proposal is to improve public understanding while ensuring that the legislation remains correctly interpreted the Historic Monuments Council would agree with proposal to prepare thematic essays to help explain the decisions taken for types such as thatched buildings, pumps and buildings with Belfast Roof Trusses. It is understood that these would not be seen as providing formal supplementary guidance and that it would not be the intention to produce essays to cover all building types.

#### **Q5 Do you agree that the interpretation of 'special historic interest' should remain consistent with the rest of the UK and that important events associated with significantly altered buildings are best acknowledged by a blue plaque?**

The Historic Monuments Council agrees that the interpretation of 'special historic interest' should remain consistent with the rest of the UK and that important events associated with significantly altered buildings are best acknowledged by a blue plaque. The rationale for this view is clearly set out in the accompanying text on p.17.

### 4.2

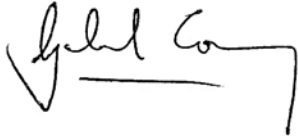
Given that the purpose of the review and the proposal is to improve public understanding while ensuring that the legislation remains interpreted correctly the Historic Monuments Council wishes to make the following suggestions:

- It would be useful to review the terminology used in the review to make it more accessible to the public and to convey the significance of the listing process as a positive and key element in the protection of the built heritage of Northern Ireland.
- The proposal also provides a very important opportunity for the Department of the Environment through the NIEA to clearly convey the important role of the Historic Buildings Council in the process and development of the listing process (including this proposal) as a statutory advisory council to the Department.
- The opportunity should now be taken, through consultation and discussion with both the Historic Buildings Council and the Historic Monuments Council, to finalise a paper that would provide explanation of the final sentence of the first criterion (C1, p.8) of the proposed revised annex C of PPS 6 regarding the decision on the appropriate designation and protection of a structure as either a listed building or a scheduled historic monument.

## Sections 5 and 6

Given the statement in the explanatory section of the proposal (Section 1, specifically 1.12, p.5) that 'the contents of the legal list will be reduced to the address and other identification information only, with the Northern Ireland Buildings Database becoming the sole source for associated descriptions and explanatory information', The Historic Monuments Council would suggest that it would be important to review the wording of Section 5.2 a) and b) (p.18) and Section 6 (p.19 ff) in general to ensure there is a consistency in the definition of what constitutes the **legal list**, particularly in relation to those buildings covered by the Second Survey of Buildings of Architectural and Historic Interest.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Gabriel Cooney', with a horizontal line underneath the name.

Professor Gabriel Cooney  
Chair

Cc Dr John O'Keeffe, NIEA