

# HISTORIC BUILDINGS COUNCIL

An advisory Council to the Department of the Environment

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Manus Deery  
Principal Conservation Architect  
NIEA: Historic Buildings Unit  
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Via mail & email

Dear Manus

## Criteria for Listing A consultation on proposed revisions to: Annex C of Planning Policy Statement 6

Council welcomes the opportunity to comment on the consultation on proposed revisions to: Annex C of Planning Policy Statement 6. Council comments as follows.

- **Section 3: C 3 Page 8 Criteria for listing introduction – Is NIEA obliged to consult district council's or are they required to notify them.** The demolition of Castlederg Cinema springs to Council's mind: 'As part of the listing process, NIEA sent advance listing notice to the owner and the local district council'. Shortly after delivery of the notices the front section of the building was demolished'.
- **Section 3: C4 Page 8 Legislation, Statutory Criteria.** C4s linkage/relation to C18s Derived Criteria. Clarification is needed, specifically where it differs, if there is difference between C4 and C18?

**Article 42(1) of the Planning (NI) Order 1991 gives the overall test for assessing a building for listing. It states that:**

***'The Department - (a) shall complete a list of buildings of special architectural or historic interest' and (b) may amend any list so compiled.***

In the paragraph below the legislation beginning 'The key criteria are, therefore, Architectural interest and historic'. Should the word 'and' not be 'or' to stay in line with the legislation?

- **Section 3: C5 Page 9** - It appears that the wording in C5 contradicts the wording in C4. The contradiction relates to the wording around 'key criteria' in these paragraphs
- **Section 3: C 17 Page 10 Features** – The word 'feature'; an example of a feature on an existing listed building would be useful especially when the document goes into the public domain. Council also feels the word 'feature' in the context of C17 is debateable.

- **Section 3: C18 Page 11 Derived Criteria** – Each listed building has an associated record, part of which, the ‘*evaluation*’ explains the reason for listing. Since 1997 this evaluation has been separated from the description of the building and supplemented by letters indicating relevant criteria. The aim has been to improve the clarity and consistency of the decisions made.
- **Section 6. Page 21 The procedural section of Annex C: Fixtures and Curtilage Structures C35 & C36.** It would be beneficial to the reader to have these items linked back to C16 & C17

## CONSULTATION QUESTIONS

### Section 4 Page 17. Consultation Questions on the criteria for listing.

**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?**

Council feels the combination of the ‘principles of selection’ will help to improve public understanding if there are no duplications or mixed references. If the content was reduced with some of the wording made clearer it would be easier to follow and understand. The content could be made more compact by combining some items.

**Q2. Do you think that the extra criteria in regard to historic interest are sufficient and clear? *Please bear in mind the legislation in this area has not been paid***

Council feel the extra criteria will be sufficient and clear if the wording is comprehensive and it refers back to key points/items

**Q3. The revised criteria point out those 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?**

***In England for example, similar reference to condition proposed in its recent consultation was removed following feedback.***

Council is content with this paragraph

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

Council welcomes thematic essays being produced as useful illustrative additions and that they are helpful as reference tools but that they are not produced to supplement this policy.

**Q4. 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?**

***An important distinction between the UK and ROI is that in ROI some structures which are preserved in a form which no longer reveal an important historic association and which are not of special architectural interest can still be protected on historic grounds. It is emphasised in the guidance that this will be rare.***

Council agrees that the interpretation of ‘special historic interest’ should remain consistent with the rest of the UK.

## SECTION 4: PAGE 17 ITEM 4.2

Council comments in response to the question ‘if you think the Department might have better achieved its aim of improving public understanding while ensuring that the legislation remains correctly interpreted in some other way, please feel free to say so’

**Comments:**

**Section 3 Historic Interest Page 13 – Age (criterion R)**

**The 3<sup>rd</sup> paragraph, last sentence ‘*buildings constructed after 1935 but not normally younger than 30 years will generally be outstanding buildings including the very best works of important architects*’ This sentence needs to be clarified.**

Council feels NIEA will miss out on an ideal opportunity to promote to the public the HBC: Council’s role, function and input, and the vast range of expertise amongst members. Including a link to the HBC website along with a few well expressed sentences could resolve this.

Council feels the presentation of the review would benefit if the wording of the review was improved in some important areas. The document is not easy reading and is unlikely to engage the public. In a more comprehensive and compact form the understanding and meaning of Listing among owners and the public might improve. The meaning of Listing and the impression it has amongst owners and the public is largely negative because of lack of understanding and education in the listing process. Many owners tend to be suspicious of their properties being listed, and the public in the main deem the listing of derelict buildings as pointless and a waste of money.

Yours sincerely



**FRANK ROBINSON  
CHAIRMAN**