



Government Advice  
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Historic England

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**Dear Sir**

**Streets for All Consultation**

The Institute of Historic Building Conservation is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

We are very pleased to have the chance to comment on the consultation document. The Institute's comments are as follows:

Inappropriate works to highways and public realms have long been a major problem impacting seriously on historic areas. The IHBC welcomes Historic England issuing guidance and practical advice for anyone involved in planning and implementing highways and other public realm works in sensitive historic locations.

We are however concerned that most of the case studies in the documents are generally single high capital schemes. The inclusion of so many of these will not assist in the day-to-day management of the public realm. Such schemes are largely irrelevant to the world of the reduced circumstances we now inhabit with limited budgets and out-sourced, privatized or regionalised highway management functions. There are no funds available to continue to maintain many of the existing environmental enhancements from the last years.

If such larger capital case studies are to be used then the guidance should also describe:

- [a] the motivation behind the exemplars (and what wider works if any, followed;
- [b] who were the parties to their design and implementation;
- [c] how long they have been done;
- [c] if a photo is on completion or recent (for long-standing scheme); and
- [d] how the continued management of them works now.

In some schemes it may be possible to endorse the use of some cheaper materials alongside small areas of high quality natural materials to minimise cost and maximise impact.

There is no mention of the possible link to Conservation Areas Appraisals which should, but rarely do, include a description of the streetscape or proper management of the same. Most Conservation Area Appraisals do not contain a streetscape audit.

None of the really valuable content of Section 5 of PPG15 was ever included. The blind inflexibility of the application of the Traffic Signs Manual 2006 (as a Further Reading entry) - passes without mention.

It would be helpful to include some specific items such as good examples of tactile paving for disabled and adopted site entrances without visibility splays and standard angular boundary walls possibly including measured diagrams for use. Advice on how to tackle proliferation of highway signs or how to design against the need for traffic signs by designing in methods of slowing traffic or natural traffic calming could also be useful.

The previous regional documents included useful numbers of detailed regional illustrations of small details and materials. It was simple for someone who is not a specialist in the historic environment, including highway engineers, to understand the principles and put them into practice. The new versions are more general, shorter and more aimed linguistically at those who already understand the historic environment and endorse the aims of the guidance. Most importantly the previous documents laid down simple general principles similar to those in the main document for each area of work (Ground Surfaces, Street Furniture, New Equipment, Traffic Management & Environmental Improvement) and gave regional examples, which were suitable, applicable and understandable. The current regional consultation documents provide just a small amount of general text and a single case study which may affect their use by local highway decision makers.

As a minor point the photograph of Aldeburgh (East of England page 3) says "well-designed modern paving and street furniture are sometimes a better choice for historic areas than off-the-shelf 'heritage' solutions" but shows a standard green wheelie bin placed inappropriately in the public realm.

At a higher level than this guidance but very much related we would encourage Historic England to turn its attention also to the fundamental strategic and legislative disconnect between transport and historic environment. There are many cases of insensitive and intrusive strategic schemes, which could be prevented. For example cases such as the proposed busway in Cambridge through the site of a Grade I listed building (eastern link busway) and across a very sensitive Conservation Area site, which is duplicating and uncoordinated with a controversial new cycle route and bridge.

Yours sincerely

A handwritten signature in black ink, appearing to read "Mark Weller".

IHBC Operations Director