



Heritage Link

Making Consultation Matter

A survey of voluntary sector experience of Local Authority
Consultation on Land-Use planning

Full report

With recommendations from Heritage Link



Section 1 **Report**
Section 2 **Appendices**

Heritage Link Land-Use Planning Group Working Party
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Heritage Link is concerned that the voluntary sector is effectively engaged in the planning process. The wealth of expertise, experience, local knowledge and civic involvement makes local heritage groups a valuable resource for local planning authorities. How to get the best out of this relationship is something that is central to Heritage Link's role in promoting the role of the voluntary sector in heritage matters.

This research was carried out in 2005-6 to produce evidence of how Local Planning Authorities are engaging with heritage groups over local planning policy and practice. The aim of the report is to identify areas of common concern and identify good practice as a basis for action, skills development and if necessary further research.



Heritage Link's Recommendations

- The potential of the Government's White Paper on Local Government Reform to support engagement and empower local communities and the voluntary sector to contribute on heritage issues should be realised
- The Planning Delivery Grant should be expanded and developed to improve skills and competencies in local government to engage communities and the voluntary sector
- Local Authorities need to diversify the range of access points for the community and voluntary sector to engage and participate in the planning process
- Review and enhance the minimum standards for Statements of Community Involvement and consultations on planning applications in order to promote continuous and meaningful engagement with the planning process
- Introduce incentives for local authorities to raise the standards of communities and voluntary sector involvement in planning
- Develop the potential of Local Compacts to establish mutual expectations for community and voluntary sector involvements with local planning authorities
- Develop a national compact between the LGA and voluntary sector organisations engaged in planning issues and standards for participation
- Provide a heritage website to signpost existing resources available on public involvement in land use planning
- Local Authorities should undertake a health check of the voluntary and community sector contribution on planning issues in their area
- Develop and build on the experience of Conservation Area Advisory Panels as a mechanism for bringing communities and the voluntary sector together on planning issues
- Include a document similar to a Statement of Community Involvement (SCI) in future Regional Spatial Strategy development
- Undertake a national review to address the particular problem identified with consultations on highways authorities in this report.

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Executive summary

- 1 The Planning and Compulsory Purchase Act 2004 introduced a major reform to the English planning system. One of the new requirements was that local planning authorities produce a Statement of Community Involvement (SCI) to set out their policy for consulting the community on development plans and planning applications. In this context, Heritage Link decided to undertake a survey to investigate the heritage voluntary sector's experience of planning consultations. In summer 2005, nearly 200 heritage groups¹ responded to the *Why Bother?* questionnaire. The objective of the questionnaire was to discover whether the time and effort spent by heritage groups in responding to local government consultations was actually making a difference to local authorities' planning policies. In particular, Heritage Link wanted to explore if their special expertise and experience made a difference to local authority decisions on planning proposals affecting the historic environment.
- 2 This document is the full electronic report of the results of the survey. The report is in three parts: firstly, an introduction to the government context on the new planning culture, community involvement and how it relates to the historic environment; second, the full report of the survey including key messages and conclusions; and finally a series of annexes including the methodology used for the survey and the full details of the statistical and open-ended results. A shorter summary document of the key findings and conclusions of the survey has already been published and widely distributed. This six page, fold out document can be downloaded from the Heritage Link website.²
- 3 The results, officially released 4 April 2006,³ revealed mixed experience of planning consultations. While 74% of all respondents had been consulted on individual planning applications and 65% on Local Development Frameworks, a much lower percentage had been consulted on planning issues affecting the historic environment (53% on applications for Listed Building consent, 38% for applications for Conservation Area consent and only 27% on Conservation Area appraisals). In terms of satisfaction, only 41% of all respondents were satisfied or very satisfied with the way their organisation had been consulted in general.

The level of satisfaction for specific types of planning consultation was even lower: 30% for Conservation Area consent, 26% on Highways Proposals and 20% on Regional Spatial Strategies.

- 4 But the results also revealed positive trends, for example, over half of all respondents (52%) believe that their contributions make a difference to planning outcomes. A number of respondents gave examples of good practice, which illustrate how the planning consultation system can work. When contributions of heritage groups are taken on board, this can bring benefits in line with wider government policies: strengthened communities, civic involvement in local government and an improved quality of the built and historic environment.
- 5 Respondents also gave examples of bad practice and noted their major concerns about the system of planning consultations. The results revealed three broad areas of concern:
 - a) **Voluntary Sector Capacity.** The strength of local groups lies in their extensive local knowledge and experience. Although heritage groups are enthusiastic and willing to dedicate time and effort, their capacity for action can be limited in terms of funds and human resources and by skills deficits and gaps. The challenges differ for national, regional and local groups. Many national and regional groups have considerable skills and experience to deal with multiple consultations but not always the capacity. To facilitate the consultation process for these groups, local authorities should act more efficiently and consistently by informing these groups early, sending out plans and other details of planning applications in good time and making more material available online. Local groups,

1 Heritage groups are defined as voluntary sector organisations concerned with the protection and enhancement of the historic and natural environment. For a full breakdown of respondents see Appendix 2

2 http://www.heritagelink.org.uk/docs/HL_Consultation_06%20FINAL.pdf

3 <http://www.heritagelink.org.uk/docs/Press%20Release%20Why%20Bother.pdf>

on the other hand, would benefit from more informal and sustained communication with their local authority staff in order to develop a good working relationship.

The survey provided supporting evidence that further training and guidance are needed. Some heritage groups were poorly informed about the recent changes to the planning system and lacked the skills necessary to participate effectively. Heritage Link and its members have a clear role to play in providing training and guidance. For example, over 7,000 copies of Heritage Link's *Guide for Heritage Groups* on Local Development Frameworks have been distributed. In addition, Heritage Link Regional Networking events provide a forum for support, training and guidance for local groups

- b) **Local Planning Authority Capacity.** Many of the concerns raised about the consultation process related to the way in which these consultations were being handled by local planning authorities. There was a major concern that local planning authorities lack the capacity and the experience to deal effectively with the requirements for community involvement set by central government. Many respondents complained of badly written documentation and off-putting language, poor communication with local authority staff and a lack of interest or expertise in planning matters relating to the historic or natural environment.
- c) **Loss of Democratic Accountability.** The survey threw up an unexpected reaction to some of the recent changes in the planning system. Some heritage groups felt that changes to the planning system were actually resulting in a reduction in their ability to influence and engage with planning decisions. Regional Assemblies were widely perceived as being high-handed and remote. The transferral of wider spatial development responsibilities from directly elected county or unitary councils to these assemblies was associated with reduced confidence in the consultation process for Regional Spatial Strategies. At local level, heritage groups raised concerns that an increasing number of planning decisions were being delegated away from planning committees to un-elected planning officers. Finally, it was felt that even well established forums for participation, such as Conservation Area Advisory Committees are not consistently consulted and not always listened to.

- 6 From the results of the Heritage Link survey we can conclude that there is a disparity between government guidance and rhetoric on planning consultations and the real experience of heritage groups on the ground.
 - a) Local authorities are not meeting government objectives to consult heritage groups early and to provide and seek constant feedback.
 - b) Local authorities are failing to facilitate wider public debate on planning matters relating to the historic environment through the avenues of local amenity societies even though this is recommended as good practice by the government.
 - c) Local authorities lack the capacity to deal with an increasing number of planning consultations and need to develop skills to communicate with heritage groups on issues relating to the historic environment.
- 7 Heritage Link can also propose some recommendations to improve planning consultations.
 - a) Consultation is worth doing and brings benefits to voluntary groups, local government and to the local environment
 - b) Consultation isn't about simply asking the public for their views. It is about building up knowledge of the voluntary and community sector and then engaging them in a two-way dialogue about planning proposals which is tailored to the interests and needs of different groups
 - c) Consultation must be done in a transparent way with integrity: involving groups early in the planning process and in a way that will facilitate the incorporation of their contributions before any final decisions are taken

1 Introduction

1.1 The new planning culture, community involvement and the historic environment

1.1.1 Government Policy on Double Devolution and Community Involvement

At the *Cleaner, Safer, Greener* conference, *A Vision of Respect*, held on 13 March 2006, the Minister for Communities and Local Government, David Miliband, gave a policy speech outlining his agenda for “double devolution”. Miliband argued that more power should be devolved both from Whitehall to the town hall and county hall *and* from the town hall to citizens and communities.⁴ Double devolution is part of a broader government aim to improve all public services by consulting with and involving local community. An independent report recently published by ODPM⁵ highlighted the benefits of community involvement in terms of increased user satisfaction, improved public services and better local environments. The report concludes that the benefits of community involvement largely outweigh the costs.⁶

Planning is one area where this new government approach has already been given expression in new policy statements and new statutory requirements.

1.1.2 PPS 1 and Community Involvement

In 2005 government published a new policy statement on planning, Planning Policy Statement 1: Delivering Sustainable Development. This document sets out the government’s overarching principles and objectives for the national planning system. These include a clear commitment to introduce effective community involvement. Article 41 states,

“Local communities should be given the opportunity to participate fully in the process for drawing up specific plans or policies and to be consulted on proposals for development. Local authorities, through their community strategies and local development documents... should play a key role in developing full and active community involvement in their areas.”

Article 43 states the criteria against which effective community involvement can be measured. Effective community involvement requires an approach which:

- tells communities about emerging policies and proposals in good time;
- enables communities to put forward ideas and suggestions and participate in developing proposals and options. It is not sufficient to invite them to simply comment once these have been worked-up;
- consults on formal proposals;
- ensures that consultation takes place in locations that are widely accessible;
- provides and seeks feedback⁷

These principles laid down in the policy statement have been matched by statutory requirements on local government to consult the community on development proposals and planning applications.

1.1.3 Statements of Community Involvement and the Historic Environment

The Planning and Compulsory Purchase Act 2004 introduced a number of changes to the planning system in England. One change was a statutory requirement on all local planning authorities to have

4 *Empowerment and Respect: Building Change from the bottom up*. Speech by David Miliband at the Cleaner, Safer, Greener Conference: a Vision of Respect 13 March 2006. <http://www.odpm.gov.uk/index.asp?id=1164236>

5 On 5 May 2006, the Office of the Deputy Prime Minister (ODPM) was re-created as the Department for Communities and Local Government (DCLG)

6 *It makes sense to ask – Woolas* News Release 2005/0180, 06 September 2005. <http://www.odpm.gov.uk/index.asp?id=1002882&PressNoticeID=1944>. One of the examples cited was the Together We Can action plan which is a cross-government collaborative venture with the objective of enabling more people to have a say on the decision that affect their local communities. *Together We Can in Harrogate* newsletter LGA Conference Special http://www.togetherwecan.info/files/downloads/pdf/wecan/TWC_Newsletter_2.pdf

7 *Planning Policy Statement 1: Delivering Sustainable Development*, ODPM, 2005

a Local Development Framework (LDF). A LDF is a flexible portfolio of documents tailored to the needs of a local area and easy to update.⁸ One of the documents that local authorities are obliged to prepare as part of the LDF is a Statement of Community Involvement (SCI).

*'An SCI is a statement of a local authority's policy for involving the community in preparing and revising local development documents and for consulting on planning applications'*⁹

The introduction of this obligation on local authorities will result in a change from a current situation where limited community consultation occurs on an ad hoc basis to one where guidelines set out in the SCI will specify minimum standards for consulting the community on both general development plans and individual planning applications.

The government has outlined a tiered approach that "sets out an indicative framework for those planning applications which should be subject to wider community involvement". One of those tiers, Tier 3, includes planning applications that fall within sites that are sensitive to development pressures. These include planning proposals that affect the historic environment, such as developments adjoining a listed building or substantial demolition in a Conservation Area.¹⁰ Alongside this context of reforming the planning system, the DCMS is proposing a major reform programme to the system for protecting historic sites and buildings that will have serious implications for the built environment. Like the ODPM, the DCMS is also encouraging wider community participation.

1.1.4 DCMS, the Heritage Protection Review and Community Involvement in Protecting the Historic Environment

In 2005, Tessa Jowell, Secretary of State for Culture, Media and Sport, presented her vision on the cultural value of the historic environment in *Better Places to Live: Government, Identity and the Value of the Historic and Built Environment*. In this essay she highlights the unique role that heritage can play in building bridges between our past and our future. She also describes her vision for a reformed system of heritage protection, one that is more consultative and involves the whole community,

*"We will move to a system that is more consultative; has systems which are open to scrutiny; explains the reasons for the decisions it makes; makes clear the scope of the protections it creates; and relies wherever it is effective and desirable on flexible agreements rather than imposed restriction. We aim for a new way of doing things, involving the whole community, and winning the support of those who own – and those who use, enjoy or simply walk past – our important buildings and sites, whether ancient or modern."*¹¹

The DCMS is currently in the process of changing the system of statutory protection for the historic environment. The aims of this Heritage Protection Review are to deliver:

- a positive approach to managing the historic environment which would be transparent, inclusive, effective and sustainable.
- a heritage protection system that is central to social, environmental and economic agendas at a local as well as national level; and
- an historic environment legislative framework that provided for the management and enabling of change rather than its prevention¹²

The government's proposals place a big emphasis on increasing wider community involvement in the designation process. In its consultation document, *Protecting our Historic Environment. Making the system work better*, DCMS spells out a number of ways through which the community and voluntary sector should be given a stronger role:

- **Government highlights a special role for the community and voluntary sector during the designation process**, "The Government is minded to require owners, local authorities, amenity societies, parish councils and the public to be informed and consulted when an application is made to place an asset on the List and to

⁸ See Heritage Link's *Guidance on Local Development Frameworks*

⁹ Article 1.1.1. *Statements of Community Involvement and Planning Applications*, ODPM, 2004

¹⁰ Article 6.2.5. *Statements of Community Involvement and Planning Applications*, ODPM, 2004

¹¹ *Better Places to Live: Government, Identity and the Value of the Historic and Built Environment*, DCMS, 2005

¹² http://www.culture.gov.uk/global/publications/archive_2004/review_heritage_protection.htm

provide protection during the consideration of listing as if the asset were already listed.”¹³

- **The new planning legislation provides an opportunity for involving the voluntary and community sector in drawing up local plans that will ensure the protection of the local historic environment.** “The Planning and Compulsory Purchase Bill’s proposal to place a duty on district and unitary authorities to produce a Local Development Framework (LDF) and a Sustainability Statement provides an opportunity to place the protection of the historic environment at the heart of local plans, reflecting the values set out in Community Strategies. It will ensure that impact on the historic environment is given due weight in development control decisions. It also provides a new opportunity to engage local communities, civic societies and parish councils in deciding what is most important in their areas.”¹⁴
- **In particular, the government attaches special importance to community involvement in the drawing up of Conservation Area Appraisals,** “The Government wishes to find new ways to encourage local authorities to provide such appraisals for their conservation areas and to involve the community in expressing what it values in its conservation area and how the area could be enhanced.”¹⁵

In summary

The government has introduced a reform of the planning system that incorporates the idea of double devolution and community involvement. The objective for involving the community in the planning process is laid out in the government’s policy statement on planning, PPS1. In addition, it has obliged local authorities to draw up Statements of Community Involvement that will specify how the local authority plans to consult the community on both development plans and planning applications. Those planning applications that touch on the historic environment are recognised by the government as requiring “wider community involvement”. The government’s proposed reform of the heritage protection system aims to involve a wider section of the community in the designation, protection and appraisal of historic sites and buildings.

1.2 The value of heritage groups in participating in the planning process.

1.2.1 The Voluntary Heritage Sector

Within the vast voluntary and community sector there are a number of organisations that work in the heritage field. Heritage Groups are voluntary organisations concerned with the protection and enhancement of the historic and natural environment. England has at least 107 national heritage bodies and umbrella groups which are dependent upon an estimated 155,500 volunteers. Estimates vary but the DCMS’s own Survey *Taking Part* figure for heritage volunteering by adults in England could put this as high as 460,000. Heritage Groups vary enormously in size, from the National Trust, which has up to 40,000 active volunteers, to local history and archaeology groups with just a handful of members.¹⁶ There are hundreds of local groups which contribute to protecting, conserving and enhancing the local historic environment and many actively engage in local and regional planning issues.

1.2.2 The Expertise and Experience of Heritage Groups.

Heritage Groups vary enormously in the work that they do. Heritage groups are not only crucial for the protection and conservation of heritage; they also play a fundamental role in restoring, managing and presenting heritage to the public.

One of many examples of the contributions that heritage groups can make is provided in the Heritage Link publication, *The Heritage Dynamo*. This publication explores some recent success stories in the delivery of heritage-led regeneration by the voluntary sector.

“Charities such as building preservation trusts and other similar voluntary bodies can make such projects happen, either directly or in partnership with local authorities or commercial developers because they have the experience, expertise and

13 Paragraph 45. *Protecting our Historic Environment. Making the System work better*, DCMS, July 2003

14 *ibid.* Paragraph 62

15 *ibid.* Paragraph 64

16 *Volunteers and the Historic Environment*, Heritage Link, 2003

determination necessary to take on and restore historic buildings.”¹⁷

The Heritage Dynamo brilliantly illustrates the contribution that heritage groups can make: they bring enthusiasm and expertise to a project, and they gain experience and confidence from it. This process by which heritage groups build up their skills and knowledge, as well as their capacity and determination to work to protect and promote the historic environment applies to all areas of work that heritage groups are involved in: whether managing a historic house, conducting an archaeological excavation, restoring a historic garden or educating school children about the history of their town centre.

1.2.3 The Special Role of Heritage Groups in the Planning Process

Through their work, heritage groups develop an expertise about the local environment and a good working relationship with the community. These skills place heritage groups in a privileged position to participate in the planning process, especially at local level. This capacity of heritage groups to be able to speak for and act on behalf of the local community was recognised in a joint Heritage Link/CPRE/National Trust report, *Recharging the Power of Place*. In the press release following the publication, Anthea Case, Chair of Heritage Link said,

“Local communities attach enormous pride to features of their local historic environment – their value needs to be recognised and understood as does the role of the voluntary sector in helping identify and “give voice” to this passion for local places.”¹⁸

Heritage Groups’ special role as representatives of the wider community on issues relating to the historic environment is long established. The Civic Trust has been working to protect the local significance of place since 1957. The 850 Civic Societies that constitute the Civic Trust “have a formal role as community watchdogs commenting on planning applications for new buildings and developments and guarding against unsympathetic changes to conservation areas and historic buildings”¹⁹

While Civic Societies play a crucial role in safeguarding the overall quality of the built environment, other heritage groups tend to specialise in protecting more specific aspects of the historic and natural environment. For example, there are local societies with a particular concern for protecting the countryside, some interested in the archaeological heritage, and others who work to protect railway and industrial heritage. Because of their specialist experience and expertise, heritage groups can make very useful and well informed contributions to planning decisions.

At national level, a number of voluntary societies have been established with the express purpose of preserving the built heritage and promoting its appreciation

In recognition of the expertise of these societies and the fact that their membership is a good cross-section of the informed public, the Government directed in the 1968 Town and Country Planning Act that all applications for listed building consent to demolish listed buildings in whole or in part in England and Wales should be notified to a number of named societies. This gave them the opportunity to offer comments on the proposals and to assist both the applicants and the planning authorities. The arrangement proved an effective one and still continues. With the Garden History Society the obligation is to consult on applications affecting registered parks and gardens.

These societies are described in various current Acts of Parliament, in government circulars and other literature as ‘The National Amenity Societies’ and this label distinguishes them from the many other local history and special interest societies which may become involved in the process of planning and listed building control. Over the years the National Amenity Societies have seen and commented on many thousands of applications to demolish, alter or extend individual historic buildings. They have responded to central government consultation on general policy proposals and helped to shape current attitudes towards building conservation.

¹⁷ *The Heritage Dynamo: how the voluntary sector drives regeneration*, Heritage Link, 2004

¹⁸ *Time to Start Valuing our Local Heritage*, Heritage Link Press Release (02/08/04)

¹⁹ <http://www.civictrust.org.uk/csocs/index.shtml>

The Joint Committee of National Amenity Societies currently comprises the Ancient Monuments Society, the Civic Trust, The Council for British Archaeology, the Garden History Society, the Georgian Group, The Society for the Protection of Ancient Buildings, The Twentieth Century Society and the Victorian Society. Several of them have regional groups or a network of regional caseworkers and agents who inform their responses.

In summary

Heritage groups are those voluntary organisations concerned with the protection and enhancement of the historic and natural environment. In addition to the diverse work done by heritage groups in conservation and, management as well as in using the historic environment as an educational resource, they also have a crucial role to play in participating in the planning process. Their local knowledge, specialist skills and experience give them a special role in representing the wider community and voluntary sector on planning and development matters relating to the historic and natural environment.

1.3 Our survey

In summer 2005, Heritage Link decided to undertake a survey to investigate the heritage voluntary sector's experience of planning consultations. The objective of the questionnaire was to assess heritage groups' experience of planning consultations against government policy aims on wider community involvement. The survey was entitled *Why Bother?* because Heritage Link wanted to discover whether the time and effort spent by heritage groups in responding to local government consultations was actually making a difference to local authorities' planning policies. In particular, Heritage Link was interested to see if the special expertise and experience of heritage groups was making a difference to local authority decisions on planning proposals affecting the historic environment.

In total, nearly 200 heritage groups responded to the *Why Bother?* questionnaire. Annex 1 outlines the methodology used; annex 2 is an example copy of the questionnaire. The results have been both

quantitatively and qualitatively analysed. The full results of this analysis are provided in annexes 3 & 4. The main report is a synthesis of both the quantitative and qualitative analysis. It presents the full analysis of the results of the survey. In general the report follows the structure of the questionnaire. The subheadings reflect the principle questions asked in the survey:

- How do heritage groups get involved in planning consultations?
- What methods do local authorities use to consult with heritage groups?
- What are heritage groups' main concerns about the consultation process?
- Are heritage groups satisfied with the consultation process?
- Do they believe that their contributions are making a difference?

The penultimate section of the report draws together the findings of the survey to ask what is working and is not working in the planning consultation process. The final section provides a summary of the key findings of the report and then moves onto a wider discussion of voluntary sector experience of planning consultations. This discussion is informed by other surveys on planning consultations as well as by government advice on local community involvement in planning. It concludes with two sets of final messages: the first is a set of recommendations about how consultation should work; the second is a set of problems that both local authorities and central government need to address in order to improve the consultation process.

2 Full Report

2.1 Section 1. Getting Involved

2.1.1 Which planning matters are heritage groups consulted on?

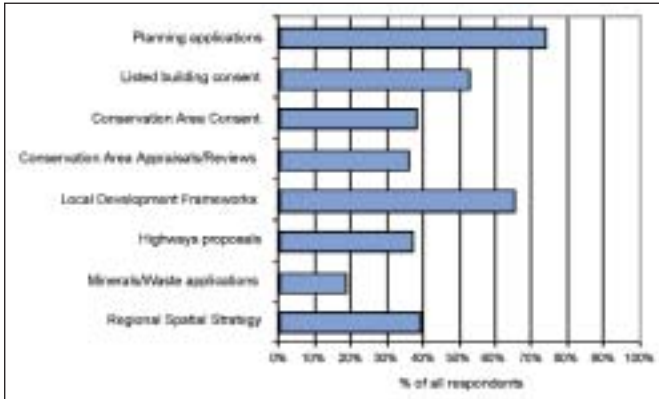


Chart 1: What planning matters are heritage groups consulted on?

Individual Planning Applications

Individual planning applications are the most common planning matter on which local planning authorities consult. 74% of all respondents had been consulted on this within the last year.

Listed Buildings and Conservation Areas

For planning applications affecting the historic environment, the numbers consulted were much lower. 53% of all respondents had been consulted on applications for Listed Building consent and 38% on applications for Conservation Area consent within the last year. Failure to consult on these planning matters was a major concern for a number of respondents. One respondent commented that:

“A registered amenity society should automatically be consulted about Listed Building consent or Conservation Area consent applications by post and without thought”

Only 27% of all respondents had been consulted on Conservation Area appraisals in the last year. Consultation on Conservation Area reviews had reached just 25% of all respondents.

Spatial Development Plans

The number of respondents who had been consulted on spatial development plans differed markedly between the two levels of plans. 65% of respondents had been consulted on Local Development Frameworks, 39% had been consulted on Regional Spatial Strategies.

Highways & Waste/ Minerals

Regarding the two planning issues dealt with by County Councils, 37% of respondents had been consulted on highway proposals and 19% on minerals/ waste applications within the last year. A number of comments expressed this low level of consultation:

- “Neither the civic society [n]or the town council are consulted by the highways department – even for development in sensitive Conservation Areas”
- “Traffic matters – no consultation until done, although matter is with county council”
- “We have had no approaches for consultation over items such as highways proposals or mineral waste extractions since the County Council’s last seminars ten or twelve years ago”

2.1.2 Who initiates consultation: the local planning authority or the heritage group?

Direct Contact

Of all the heritage groups questioned, 70% are contacted directly about consultations by their local planning authority. In general, heritage groups prefer being contacted directly. One national heritage group commented,

“Direct communication is preferred; the others are back-stops”

A large number of groups that are contacted directly also sometimes find out about consultations in other ways. In total, 52% of all respondents find out about consultations through other means. Comments

revealed a great variety of ways by which heritage groups hear about planning proposals, from the local press to word of mouth.

Planning Lists

The most common way that heritage groups indirectly find out about planning consultations is from planning lists. 65 respondents mentioned these, although the way by which they are acquired varies enormously. One branch group of the CPRE notes that they pay for the planning agenda and register to be forwarded to them. One Civic Society comments,

“We campaigned some years ago and now receive a copy of the application register”.

The survey revealed an increase in the use of the internet by local authorities to distribute information about planning applications and consultations. Some groups receive a list of planning applications by email. A number of heritage groups consult planning lists on their local authorities’ website. Two groups complained that they used to be sent the lists by post, but now can only access these online.

Pro-active heritage groups

The initiative shown by a number of heritage groups to seek out and consult planning lists is indicative of a broader trend in planning consultations. A number of free text responses reveal that the consultation process is not simply about local planning authorities soliciting the views of voluntary groups on their terms. Instead, the survey reveals that voluntary heritage groups have their own part to play in being the instigators of the consultation process and in ensuring that they are involved in planning matters. Two Civic Societies commented,

- “In almost all cases, we have to take the initiative to get consulted. Once that is done, things work out satisfactorily”
- “The LPA rarely initiates a consultation with our society, but we have adequate opportunity to find out about planning issues and contribute our views”

The Value of Networks

A number of heritage groups found out about consultations through the networks of the voluntary heritage sector. Seven respondents said that they had found out about planning consultations through their umbrella organisations (for example CBA, CPRE and the London Forum of Amenity and Civic societies) and ten respondents learnt about consultations from other local heritage groups. By co-operating and communicating, voluntary groups can not only keep each other informed about important planning consultations but can also begin to work together to assert a stronger voice in the consultation process. One example is a Joint Liaison Group that was set up between three neighbouring Civic Societies and on which representatives from the development services department of the District Council were invited to join. The group has provided a forum for useful discussions about of the revision of the District Local Plan.

2.2 Methods of Consultation: Experience & Preferences

2.2.1 Survey results

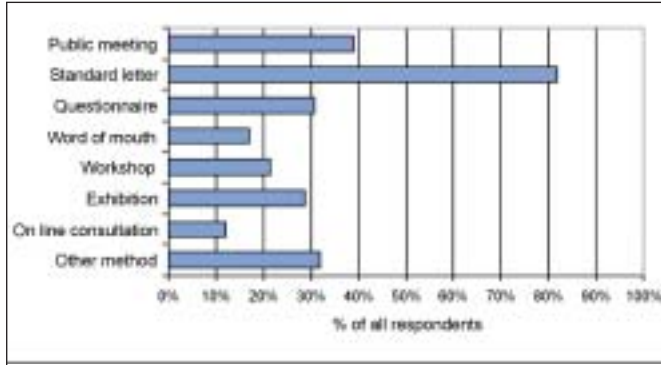


Chart 2: How are heritage groups consulted on planning issues?

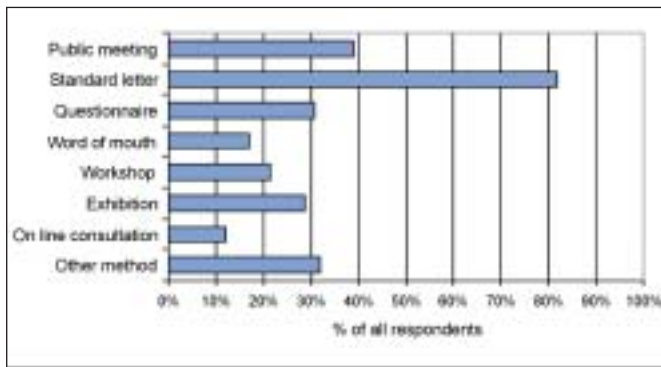


Chart 3: What are the preferred methods of participation?

2.2.2 Commentary

Standard Letter

The standard letter is the most common method used to invite heritage groups to participate in planning consultations. 82% of all respondents had participated in this way. This method of participation is also consistently the most popular for all planning matters. One Civic Society qualified this preference, “Generally prefer starting with letter – then other options depending on scale of issues”.

Workshop/ Public Meeting/ Exhibition

After standard letter, public meeting was the second most common method by which heritage groups had been invited to participate (39% of all respondents). The percentages of respondents who had participated in workshops and exhibitions were lower (21% and 29% respectively).

Preferences for workshops, public meetings and exhibitions differ for each planning matter.

- For Highway Proposals and Mineral/ Waste applications, exhibitions are preferred.
- For Local Development Frameworks and Regional Spatial Strategy, public meetings and workshops are preferred.
- For Listed Building and Conservation Area consent, public meetings are preferred.

A number of respondents expanded on their experience of these types of consultation.

One Civic Society described an exhibition organised by their district council for the planned building of three new housing estates as an example of good practice. The exhibition was open to the general public, manned so that questions could be asked and there was plenty of time to send in comments. However, the group was concerned that exhibitions are, “...often unavailable to those not working locally i.e. not usually a Saturday and never a Sunday”. To solve this problem, they suggest moving exhibitions from the town hall to a pub or a pub car park.

Another Civic Society gave an example of a design workshop chaired by The Prince’s Foundation for the Built Environment with the participation of all stakeholders: the Civic Society, members of the community, the Town Council, the developer and the local authority. The workshop resulted in a statement from the community stakeholders which,

“...set out eight aspirations and a commitment by all stakeholders to have regular meetings during the design stage – so that plans, when eventually submitted, would contain no surprises. We have had seven Review meetings plus numerous other consultations. A report of each Review meeting has been available in the Town Council offices, Tourist Office and the Library”

Questionnaire

Less than a third (31%) of all respondents had been consulted on planning matters by questionnaire. A number of these heritage groups expressed concern about this method of participation. One Civic Society who had recently been consulted on town centre redevelopment by questionnaire said,

“We have an issue with questionnaires which are invariably ‘loaded’, and with the Local Authority’s interpretation of the results, where tiny response levels are expressed in percentage terms, giving a false level of approval to something the LA has decided that it wants to do.”

Online

The least common method by which heritage groups had been asked to participate in the consultation process was online. Only 12% of all respondents had been consulted in this way. In terms of popularity, responses were polarised with respondents either stating a clear preference or a clear dislike for this method of consultation. This was especially true for individual planning applications, and those planning applications affecting the historic environment.

Although it was the least usual method, it was the one that attracted the most comments and concerns:

- “Prefer standard letter to online currently – other society members not yet online” (Local Heritage Group)
- “They [consultations] should not refer to documents which are only available online” (Civic Society)

And from the opposite point of view:

- “Lack of progress with the planning portal and viewing applications and supporting documents online” (Civic Society)
- “Much more should be made available online. Busy working people don’t always have time to visit Library/Local office to see plans” (Civic Society)

Other Methods of Participation

Fifty-eight respondents had participated in the consultation practice in another way. The most common method was via advisory committees or planning user panels. In total 23 societies mentioned that they sat on such panels. The majority of these (14) sat on Conservation Area advisory panels (CAAPs). Conservation Area advisory panels are long established consultation committees through which local planning authorities can solicit advice on planning proposals within Conservation Areas from representations of both local and national amenity societies. This survey showed that these advisory panels still have a very important part to play in harnessing the expertise and advice of heritage groups. Some heritage groups commented on the key role that they play in these panels. Other heritage groups warned that these panels aren’t consistently consulted.

- “There are three Conservation Areas advisory committees in our London Borough. The society chairs two and are represented on a third” (Civic Society)
- “Some applications for Listed Buildings or Conservation Areas are deemed by local authority to be too minor to refer to the CAAP. This is not always the view of the panel” (Civic Society)
- “We can ask to discuss all conservation issues at Conservation Advisory Panel and anything near Harbour at Harbourside Forum...CAP could work well if comments [were] properly recorded verbatim as required by constitution.” (Civic Society)

2.3 : Top Concerns about the Consultation Process

2.3.1 Voluntary Sector Capacity

One of the primary concerns to come out of the survey was the limited capacity of heritage groups to fully and effectively participate in the consultation process. Despite their enthusiasm, heritage groups' capacity for action can be limited in terms of time, funds and human resources.

For smaller groups, time was a major limiting factor because, for a group that only meets once or twice a month, a relatively short consultation period for planning applications is unlikely to be sufficient for them to assemble their members and prepare a meaningful response. Some comments included,

- “We often have insufficient time to consult at committee before making representations” (Civic Society)
- “Some applications are determined very quickly, which does not always fit well with meetings every 4 weeks”. (Civic Society)
- “[Consultations are] time consuming and challenging for volunteers” (Diocesan Advisory Committee)

The larger heritage groups who are engaged over a geographically wide area, or who are involved in a large number of consultations were challenged by too many consultations. Their situation can be summed up by one Civic Society who complains of “consultation fatigue”. They comment that,

“...it is best if local societies are pro-active and produce alternatives, call meetings if necessary and make informed comments. But often we have to go to committee [meetings] and make statements (which should not be necessary) and drum up public awareness via the press, to get attention paid to our views on major developments in central areas”

2.3.2 Consultation Material.

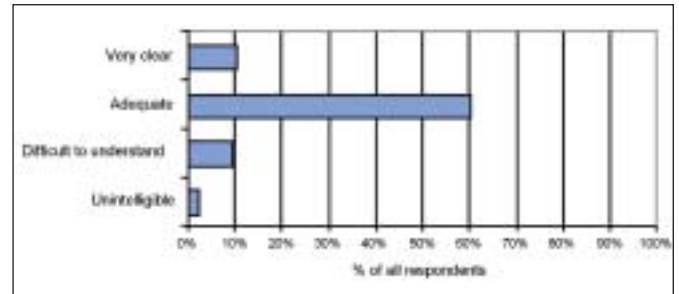


Chart 4: Did you find the language of consultation and subject matter intelligible?

One major area of concern was the consultation material itself. Many respondents commented on the poor quality, complexity or sheer volume of the consultation material. One Civic Society wrote,

“While the aim of maximum consultation is admirable, the actual drawn-out process of unreadable documentation is in fact counter-productive”

Only one in ten respondents find the language and subject matter of consultation “very clear”. Many respondents complained that written documentation they receive is repetitive, full of jargon and uses incomprehensible language. Local Development Frameworks and Regional Spatial Strategies are singled out as particularly poor in this regard.

One heritage group sent an example of the unreadable document,

7.1 “Following the consultation period on the Scoping Report the Interim Sustainability Appraisal Report will be prepared to accompany the Issues and Options Paper. Subsequently the Final Sustainability Appraisal Report for Development Plan Document Number 2 will be prepared to accompany the Preferred Options Report for the Development Plan Document.”

As well as issues of clarity and comprehension, heritage groups also sometimes experience difficulties in accessing consultation documents and plans. Without details of specific planning proposals, they cannot make an informed response.

- “Most proposals lack clarity. [We] need access to the full information available in hard copy – good plans needed & model if possible” (CPRE Group)
- “We do not always have access to plans in time to comment; re-visions of plans are not always communicated to the Trust” (Civic Society)
- “All plans being available online attached to the planning applications would help” (National heritage group)

2.3.3 Poor Communication

Another major obstacle to an effective consultation process, raised by a number of the respondents, is the lack of communication between local planning authority staff and heritage groups. When letters are not acknowledged, phone calls not returned and emails not replied to, heritage groups can feel they are being a nuisance to their local authority and that their contribution is unwelcome. One heritage group’s prime concern was that there are,

“...no standardised response or comment modes...we are never informed when cases drag on and negotiations are taking place”

This failure to keep heritage groups informed can leave them feeling frustrated and disconnected from their local planning authority. One Civic Society said,

“There is very little personal contact with the LPA. They are perceived as being remote, inefficient and bureaucratic.”

A number of respondents highlighted the fact that sometimes this communication problem could be pinpointed to individual members of staff. One Civic Society gave an example of the negative effect that one high ranking member of staff had on the overall attitude of the planning authority when she moved from one LPA to another,

“There was a major change in our relations with them. The one from which she moved became far better at communicating with us, and the one to which she moved changed from an open and responsive authority to one where unwillingness to communicate with local groups and residents and noticeable hostility towards them became a feature noticed by all amenity societies in the area. The balance had changed due to one individual”

2.3.4 Loss of Democratic Accountability

This survey raised a number of concerns about planning committees. Planning committees serve as an official forum for community participation in the decision making process on planning applications. Representations are included in the Officer’s Report to the Committee which may be openly discussed at the meeting. In addition, the public is allowed to attend and, increasingly, is being allowed to speak at planning committees. However, a number of heritage groups raised concerns that this opportunity for expression was being seriously curtailed. Specific concerns included biased or inaccurate reporting of their views to the committee, time limits on public speaking or outright refusal to allow the public to comment. For example, one Civic Society commented,

“In the planning officers’ report to the Planning Committee, our submissions from three lengthy letters were reduced to two lines!”

The greatest concern expressed was that government policy, and especially its emphasis on speeding up the planning process, is resulting in a reduction of the number of planning applications being referred to this democratic forum. A number of heritage groups linked this delegation of planning decisions away from elected planning committees to un-elected planning officers with a loss of democratic accountability. One Civic Society commented,

“We had a case recently concerning a grade II Listed Building, which covered its refurbishment and included development on surrounding land with flats & cottages. We felt it was a reasonable and attractive application. The application was never considered by the planning committee and was refused solely on the say-so of the officers”

2.3.5 Local Authority Capacity

A number of respondents raised concerns about the disparity between central government planning policies and the local authority’s ability to consult effectively with their local communities. Some respondents felt that in order to meet government demands for more consultation, local authorities need to be given more resources.

- “We are sceptical about reconciliation of government insistence on more and more consultation, and government demands to speed up decision making.” (Civic Society)
- “LA planning department is helpful and friendly but under enormous government pressure without adequate resources” (Civic Society)

In addition, a number of heritage groups commented on the limited human resources of local authorities to deal with planning consultations affecting the historic environment. One Civic Society mentioned the positive effect of employing a conservation officer.

“District Council has improved considerably since the recent appointment of a conservation officer, but there is still far too much delegation and not enough consultation with the community”.

2.4 Being Listened To

2.4.1 Are heritage groups satisfied with the way they are consulted?

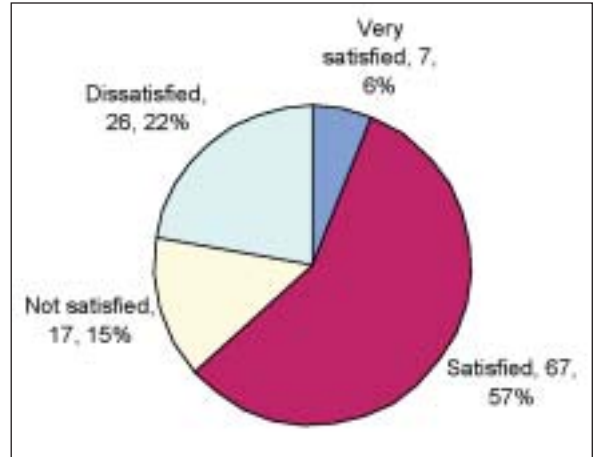


Chart 5: General level of satisfaction with the way heritage groups are consulted

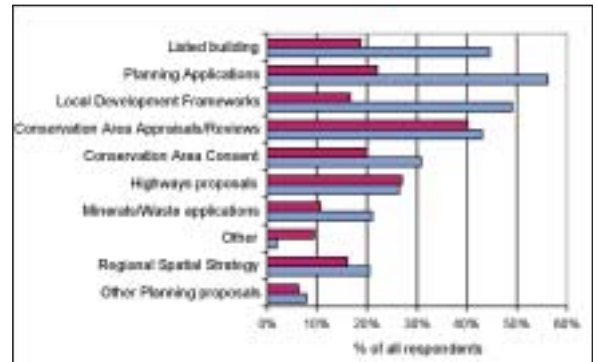


Chart 6: Level of satisfaction with the way heritage groups are consulted on different planning matters.

In general, only 41% of all respondents were satisfied or very satisfied with the way in which their group is consulted.

Levels of satisfaction differed according to the consultation type. The highest level of satisfaction came from individual planning applications with 56% of all respondents being satisfied or very satisfied with the way they are consulted. Consultations on Local Development Frameworks and applications for Listed Building consent also received relatively high levels of satisfaction (49% and 45% of all respondents very satisfied or satisfied respectively).

Consultations relating to Conservation Areas, however, received much lower levels of satisfaction. Only 30% of all respondents were satisfied or very satisfied with consultations on Conservation Area consent, 23% of all respondents were satisfied or very satisfied with the way in which they were consulted on Conservation Area appraisal and the figure is 20% for Conservation Area reviews.

2.4.2 Do heritage groups believe that their contributions make a difference?

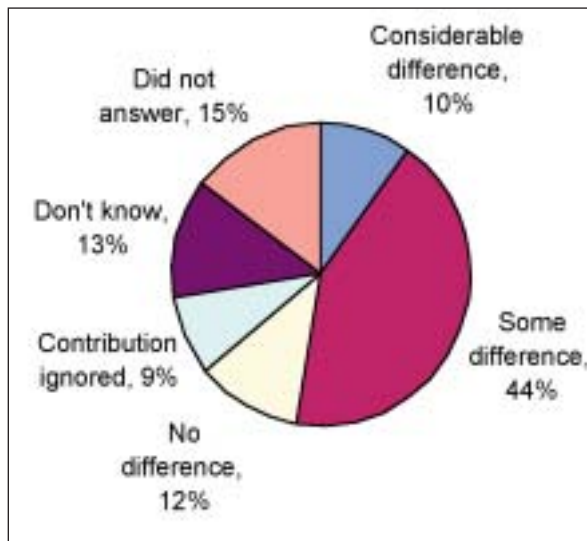


Chart 7: Do heritage groups believe that their contributions make a difference?

The results for this question were fairly positive. Over half (52%) of all respondents believe that their contributions make a difference. This confidence is reflected in one comment by a Civic Society,

“With regard to planning applications, our objections and comments are regularly included in grounds for refusal and/ or required conditions”

On the other hand, many societies expressed the feeling that they weren't being listened to. One fifth of all respondents believe that their contribution is being ignored or that their contributions make no difference. This sense of disillusionment with the consultation process is reflected by a number of comments:

- > “on the whole we feel we are wasting our time – planning department only listens when our views coincide with theirs” (Civic Society)
- > “community involvement means a rubber stamp of decision previously taken” (CPRE Group)
- > “the authorities seem to do what is necessary by the book and then do what they like anyway” (Civic Society)
- > “Consultation is worthless unless some account is taken of results. Government bodies rarely pay other than lip service which leads to frustration in view of considerable voluntary time/ effort in responding.” (Civic Society)

Examples of consultation being ignored

- > “Revised planning brief for rail interchange site took on local views about heights of buildings – but then the council decided not to adopt the brief!” (Civic Society)
- > “Listed Building. Serious objections to damaging and neighbour-intrusive alterations disregarded. Unsatisfactory permissions given” (Civic Society)
- > “A proposal for 120 new dwellings on the edge of town seems to have been negotiated by the district council with a developer without prior reference to any local interested party. Neither the Town Council nor the Civic Society was consulted, but we have jointly objected that this is out of character with our historic town, disproportionate to its population of 2600, and would increase existing serious traffic congestion.” (Civic Society)
- > “We were not consulted until incorrect information had been given to the developer so that the forestry development took place in the wrong location. The development is now over the line of the Roman Road instead of avoiding it.” (Local Heritage Group)
- > “Not consulted at all when the District Council decided to sell a Grade 1 Listed Building in its ownership” (Civic Society)
- > “Historic warehouse demolition agreed despite views of this and another Civic Society and Conservation Advisory Panel (warehouse was in the shadow of a great historic ship)” (Civic Society)

Examples of consultation making a difference

- “Farmhouse saved from demolition and listed Grade II” (Civic Society)
- “Full consultation with Borough Council and local MP, which resulted in refusal to build electrical substation for west coast main line railway in green belt land.” (Civic Society)
- “A proposal to form a new Conservation Area: our comments were mostly well received and implemented.” (Civic Society)
- “On the UDP, concerted public effort prevented an area of green belt from becoming an industrial estate” (Civic Society)
- “County Council, having been given its mineral extraction targets by the Government, invited us to participate in negotiations on its suggested quarrying proposals. These resulted in proposed new quarries in the AONB being removed from the list and the targets being reduced.” (Welsh Heritage Group)
- “The draft boundary for a proposed Conservation Area agreed after site visit with society. Council wants the society to take the lead on public consultation (17 years after first seeking the CA). Council officers and local councillors attended first public meeting. Further public meeting to be held.” (Civic Society)

2.5 What’s Working?

2.5.1 Good Practice

In our questionnaire, we asked respondents to give one example of a good recent consultation. Of the 100 respondents who replied specifying the consultation type, the most common planning matter given as an example of good practice was individual planning applications. The second most common type was consultations relating to LDFs. In total there were 22 examples of good recent planning consultations relating to the historic environment (Listed Buildings and Conservation Areas). Following these examples of good practice, this section aims to explain what’s working in planning consultations.

2.5.2 Local Development Frameworks: What is Working

All the following quotations are from heritage groups who gave Local Development Frameworks (LDFs) as their example of a good recent consultation:

- A number of local heritage groups welcome the consultations on LDFs as a way to get more involved in the planning system:
 - “We have been well informed about changes from UDP to LDF” (Civic Society)
 - “Statement of Community Involvement has just been given to us to fill in. We would hope that once registered we will be more informed” (Civic Society)
 - “Changes made to draft LDF incorporated some of our ideas/ suggestions” (CPRE Group)
- LDF consultations are also an opportunity for local planning authorities to experiment with different methods of public consultation.
 - “Regarding the Local Development Framework, two planners made a presentation at one of our recent monthly meetings describing how they proposed to organise the consultation process” (Civic Society)

- “Workshop on LDF. Great for engaging new people in planning” (CPRE Group)
- “Our District Council is currently trying to engage the public’s interest in the Draft Supplementary Planning Document by letters, response forms, copies in libraries and articles in the press” (Civic Society)

2.5.3 Relations between Local Planning Authorities & Heritage Groups.

For all types of planning consultations conducted between the local planning authority and the heritage group, communication and mutual respect is essential for a good working relationship. The following comments show that where LPAs and heritage groups get on well, the latter can contribute much more to the planning process.

- Some local planning authorities have a great deal of respect for the heritage groups and acknowledge their experience and expertise,
- In many cases we are consulted by the District Council as part of public consultation. We do receive priority as an informed consultee. One Committee member is a retired County Architect – a valuable contribution. It is useful that, as current Chairman, I am a retired Chartered Surveyor who practised in this town for the last 20 years of my working life.”(Civic Society)
- “Our district council takes note of all our comments and respects them. Over 40 years of working amicably together have resulted in many alterations to bad designs, refusals of permission. We have put an enormous amount of time, funding, expertise and enthusiasm into the system.” (Civic Society)
- Good communication between local planning authorities and heritage groups can take some time to establish. Regular meetings with planning officers and council members can help build up a good working relationship.

- “Local knowledge is an important factor in the planning process. There is now a good planning relationship between the county council, the city council and our Archaeological Society” (Local/Regional Heritage Group)
- “I have a distinct advantage in that I have been secretary of the society for 25 years...planning officers know me and are very good about including me in issues informally.”(Civic Society)
- “Leader of City Council and Chief Planning Officer and Area Co-ordinator met our Planning Group for first of quarterly consultations” (Civic Society)
- “Having a Planning Users Group meeting quarterly with council members and officers is useful” (Civic Society)

2.5.4 Heritage Groups as Watchdogs over the Historic Environment

This survey has highlighted ways by which voluntary groups can act as watchdogs over their historic environment by being pro-active, participating in the consultation process and advising local planning authorities on how both planning applications and development strategies should always take the historic environment into consideration. Here are a few examples:

- “One Civic Society has contributed in a variety of ways: “Involvement with the Local Planning Authority design panel. Creation of Conservation Areas. Amendments to application proposals”
- One well established Civic Society has set up its own “Design Awards for good modern architecture, which respects the historical context and by which we hope to raise awareness”
- Even small, local history groups can play a role as watchdogs over their historic environment. “We inspect planning applications and advise on historical background if we see that protection, photographic recording, sampling or excavation are required”

An Exemplary Local Planning Authority

- The survey spotlighted some local planning authorities that had undertaken consultations with heritage groups in an enthusiastic, efficient and effective manner. Westminster City Council was independently praised by two London-based heritage groups and two national amenity societies as an example of good practice.
- “WCC and individual planning applications – the Society is sent the entire planning application and all its supporting documentation (even if it is not necessary for our purposes)... In that regard, Westminster is a beacon of excellence.”
- “WCC send us details with drawings of some 150 applications per year. All are good examples of consultations”

2.6 Section 6. What’s not Working

2.6.1 Bad Practice

In our questionnaire, we asked respondents to give one example of an unsatisfactory recent consultation. After individual planning applications, the second most common category of bad practice given was for planning proposals on highways and transport (16 examples). Consultations on highways and transport proposals also received the highest level of dissatisfaction from heritage groups, with 27% of all respondents being unsatisfied or dissatisfied. In total there were 19 examples of bad practice on planning consultations relating to the historic environment. There were also a number of heritage groups whose examples of bad practice related to the conservation of the natural environment, for example the removal of trees from a village entrance or clashes with the council over the removal of hedgerows. The various examples of bad practice, together with comments drawn from other parts of the questionnaire, point to areas where planning consultation is not working so well.

2.6.2 Local Development Frameworks: What’s not working

The consultation process for Local Development Frameworks (LDFs) is working in some ways but it is failing in others. This survey has revealed a divided experience, with some heritage groups satisfied and others unsatisfied. These quotations convey the feelings of some of the heritage groups who gave Local Development Frameworks as their example of a bad recent consultation.

- “District Council LDF: the thoughts in LDF are so alien – where is concern for heritage? Way down the line”(Civic Society)
- “Our first impressions of the new Local Development Frameworks processes are that they are convoluted, bureaucratic, time-consuming, resource intensive and likely to fail.”(Civic Society)

A third Civic Society experienced poor practice at every stage of the consultation process on LDFs. They describe the documentation they were faced with as “unintelligible jargon”. Even though they made suggestions for change, “none were incorporated in the next draft”. In summary they wrote,

“The Local Development Framework plans are very important and have to be consulted on. The government needs to be told the process is not working and in the case of our Borough Council is a joke”

2.6.3 Regional Spatial Strategies

Regional Spatial Strategies were given as the example of bad practice by six heritage groups, but they were criticised by a number of other heritage groups elsewhere on the questionnaires. In contrast to the variable consultation experience of Local Development Frameworks, there seemed to be a near uniform condemnation of Regional Assemblies and consultation on regional spatial plans. Criticisms and concerns about Regional Spatial Strategies came from the five of the nine regions (including the Greater London Authority’s London Plan). There were two main concerns: firstly, the complexity of the Regional Spatial Strategy response system. With the East of England Plan making up 4.5 kg, and each aspect requiring a separate page of email response, one Civic Society commented that the

“Regional Spatial Strategies are designed to meet planner’s needs, not responders.”

The second main concern was the loss of democratic accountability that the transferral of wider land-use planning responsibilities from elected county or unitary councils to non-elected regional assemblies entailed. One Civic Society in the south-west wrote,

“It appears that there will be no direct democratic accountability in respect of the development strategies proposed by the regions.”

2.6.4 Inconsistency between Local Planning Authorities

One of the most common concerns raised in this survey was the inconsistency in the consultation process between local planning authorities (LPAs). Inconsistency was noted at different stages of the consultation process and for different types of planning consultation.

- One Civic Society experienced inconsistency on the consultation process for Statements of Community Involvement. It described three of the District Councils that it dealt with as “generally excellent” and all the others as “variable”.
- Heritage groups working in London seem to experience some of the greatest inconsistency in planning consultations. One Civic Society deals with five London Boroughs: one consults directly all the time, two consult directly some of the time and the other two only consult via Westminster City Council. This heritage group’s level of satisfaction with the consultation process varies between the different London boroughs,

“So far as Westminster is concerned, the arrangements are flawless...with other LPAs, the best response would range from OK to awful.”
- The same society experiences great inconsistency with the consultation practice of the Greater London Authority.

“In regard to consultations with the GLA, we are consulted directly on the most haphazard basis imaginable where consistency in approach is wholly absent.”
- The experience of inconsistency between the local planning authorities is starkest for national heritage groups. One national amenity society commented,

“In summary, what we need is prompt notification regarding waterside developments with plans of site, and waterside elevation for consideration by committee, in order to respond within a very limited statutory period. The process whereby we get these varies between LPAs from easy to almost impossible”

2.6.5 Developers

A number of heritage groups commented on the role that developers play in the planning process. Some of the more sceptical groups were concerned that developers don't always fully consult the community on their planning proposals, that they can sometimes have scant regard for the historic environment and that they seem to have a disproportional influence on the planning process.

- "...big developers have only financial gain in mind; the historical aspect is of no interest to them." (Civic Society).
- "Developers put in totally inappropriate proposals first and when these refused, something only a little better, which is very difficult to get refused again" (Civic Society)
- "Sometimes, especially regarding major applications, the developer will 'consult' prior to submission of a planning application – but often only when the scheme(s) have reached too advanced a stage for serious comments to be able to be taken on board" (Civic Society)

Pre-consultation is becoming more common practice, that is, where local authorities, developers and statutory consultees consider proposals in advance of the submission of a planning application. The exclusion of voluntary heritage groups from early discussions means that their influence is even more limited.

An Undervalued Heritage Group

Sometimes, heritage groups with enormous experience about the historic environment are ignored by the local planning authority. One Civic Society provided a rich account of its experience in the context of a small historic town:

"An application to build a terrace of houses on the site of the Old Gasworks in the Conservation Area. The plans were for an "industrial" style terrace. The built result was a terrace of houses clad with bright white, blue and grey metal panels and topped with large white cones- very visible from all the high ground around the town and dwarfing a charming Arts and Crafts House next to it. The Trust strongly objected to plans that it considered did nothing to "conserve and enhance" the Conservation Area and also went against the spirit of the Local Plan. Our objections were ignored. There has since been an angry outcry in the local community who are asking "why did the Trust allow this to happen"!!!! At this time we are in correspondence with the District Council and hope some mitigating actions will be taken by them in due course if only to change the colour of the panels.

In the meantime there has been another application in the Conservation Area for a terrace in similar type with stainless steel butterfly roof and metal cladding. While the Trust has no objection to modern design, it believes that materials which complement the medieval town are more appropriate."

2.7 Discussion

2.7.1 Key Messages from the Survey

- Heritage Groups are satisfied with the consultation process when they are directly approached by their local planning authority, when they are listened to and when their contributions are making a difference to the quality of the local environment.
- BUT Heritage Groups can become disgruntled with LPAs over one particular issue, especially when this issue is of major concern to them but not recognised as requiring consultation by the local authority.
- This survey shed light on those planning issues of special concern to heritage groups:

- Highways proposals
- Listed Building consent
- Conservation Area consent

Key success factors for effective consultation seem to be:

- Engage with heritage groups and invite them to get involved;
- Maintain communications between local authority planning staff and heritage groups;
- Listen to their contributions and acknowledge their expertise on the local natural and historic environment;
- Provide feedback detailing how the local authority will incorporate their contributions into policies and proposals and;
- Nurture the long term relationship.
- Consultation seems to be working much better at district council level than at higher tiers. Many heritage groups feel that county councils tend to ignore them and that regional assemblies are too remote
- The survey indicated some possible solutions for better involving heritage groups in planning decisions. Conservation Area Advisory Panels (CAAPs) were mentioned by a number of heritage groups as providing a formal structure for the discussion of planning proposals that

affect the historic environment. These panels should ensure that the views of heritage groups are fully represented but in order to be fully effective, CAAPs need to be consistently consulted and always listened to.

The survey demonstrated a difference between the challenges faced by national heritage groups and local ones in the consultation process:

- National and regional heritage groups experience difficulty in dealing with the large volume of consultations they receive and the short timescales within which they are requested to respond. Although the statutory period allowed for responses from National Amenity Societies is 28 days, responses in 14 days are not uncommon requests. They have the skills and experience to deal with multiple consultations but not always the capacity. To facilitate the consultation process for these groups, local authorities can act more efficiently and consistently by informing these groups early, sending out plans and other details of planning applications in good time, ensuring that applications have appropriate documentation and by making applications available in full online.
- The National Amenity Societies' current pilot with electronic notification has highlighted a number of issues. The ease of electronic notification means that some authorities are now notifying far more cases for comment than previously. The cost of printing out application documents, formerly done by the local authority, is now being passed to the NAS. Many NAS depend on volunteer caseworkers to assess applications on the ground and these volunteers are not trained or equipped to access, download, and print extensive application documents. The challenge is to equip volunteers with skills and capacity to respond to electronic consultation.
- The needs of local heritage groups are different. They would benefit from more informal and sustained communication with their local planning authority staff as well as from acknowledgement of their expertise about the local historic environment. As they lack the

capacity to deal with a high number of planning consultations in a short amount of time, consultations should ideally be tailored to their interest and expertise.

Finally, this survey has highlighted a need that the government should back up its policy on community involvement in planning matters with both additional resources and training for local planning authorities.

In particular, local planning authorities would benefit from

- Having access to local authority staff with conservation expertise.
- Training frontline staff in communicating with public
- Government guidance on improving the quality of consultation material so that it is comprehensible and easy to respond to.

2.7.2 The findings of Heritage Link's survey in comparison with wider research on community involvement in planning.

Royal Town Planning Institute: Guidelines on Effective Community Involvement and Consultation²⁰

“Effective consultation enables such decisions and plans to be approved in the knowledge that stakeholders and the public generally have had a full opportunity to express their views and make representations in a genuine and transparent dialogue.”

The RTPI's best practice guidelines on community involvement reiterate a number of the concerns uncovered in Heritage Link's survey. The recommendations discussed here are strongly supported by the experience of heritage groups of planning consultations.

The guidelines begin by emphasising the need for local authorities to build up a good working relationship with community and voluntary groups. Local planning authorities should be realistic, clear and consistent in their communications with voluntary groups so that voluntary groups know what to expect from consultations and how best they can

contribute. To avoid consultation fatigue, the RTPI recommends targeting consultations so as to make best use of the public's limited capacity for involvement.

To achieve effective consultation, the RTPI recognises that local planning authorities require to train front line staff and to budget for consultation. RTPI also made some recommendations about enabling the consultation process itself by selecting appropriate and enjoyable methods of participation and developing the use of e-consultation especially for statutory consultees while,

“Ensuring that the use of e-consultation is never such as to exclude those without digital access from participating in specific consultations.

Finally, the RTPI set a number of standards for community involvement: integrity, visibility, accessibility, confidentiality and transparency, full disclosure, fair interpretation and publication. One of the key principles of integrity was that, “A formal consultation should not be undertaken if the decision has already been taken”. The need for the adoption of such a principle was strongly articulated in the findings of the Heritage Link survey. The wide scale adoption of a standard of integrity by local planning authorities would go a long way to combating some of the scepticism expressed in the Heritage Link survey that local planning authorities only saw consultation as a “tick box exercise”.

Urban Forum: Policy Briefing, March 2006, Planning Research²¹

A short piece of research into community and voluntary groups' awareness of the planning system and their experience of engaging with it was carried out in November 2005 by the umbrella body for community and voluntary groups interested in urban and regional policy, Urban Forum. A number of the chief findings of the research corroborate the findings of the Heritage Link survey. Almost all of Urban Forum's respondents who were regularly involved in the planning system were able to cite benefits:

²⁰ [http://www.rtpi.org.uk/resources/publications/Consultation Guidelines_web.pdf](http://www.rtpi.org.uk/resources/publications/Consultation_Guidelines_web.pdf)

²¹ http://www.urbanforum.org.uk/pdf_files/planning_research_0406.pdf

- A better understanding of the system and its relevance
- Having their voice heard
- Better able to influence decision making in the area
- Providing planners with a better idea of what the community wants and therefore increasing the likelihood of a project being successful

The Urban Forum survey highlighted a chief concern that also had arisen in the Heritage Link survey. It found that community involvement often happens too late in the process. As a result, engaging in the planning system can be a demoralising experience for some groups because they put a lot of effort into influencing planning decisions but without any success.

National Planning Forum: Community involvement in town and country planning. Good Practice note 1²²

In response to the changed planning system introduced through the Planning and Compulsory Purchase Act 2004 and subsequent government policy on Community Involvement in the planning process, the National Planning Forum has prepared and endorsed ten principles on community involvement in town and country planning. These principles have been drawn up as a model for community groups against which the actions of local planning authorities and developers can be measured and upon which voluntary groups can base a dialogue with the major players. They confirm both the recommendations of the RTPI and the findings of the Heritage Link survey.

The National Planning Forum advocates that community involvement should be a “permanent thread which runs through all planning and development activity”. In summary, it states that community and voluntary groups need to be involved in the consultation process at an early stage and that consultation should be a, “two-way listening and questioning process” that is transparent, open and inclusive.

In summary

Although the research and guidance of these organisations refers to all voluntary and community groups and not just heritage groups, they do serve to reiterate some of the most important findings of Heritage Link’s survey.

- 1 Consultation is worth doing and brings benefits to voluntary groups, local government and to the local environment
- 2 Consultation isn’t about simply asking the public for their views. It is about building up knowledge of the voluntary and community sector and then engaging them in a two-way dialogue about planning proposals which is tailored to the interests and needs of different groups
- 3 Consultation must be done in a transparent way with integrity: involving groups early in the planning process and in a way that will facilitate the incorporation of their contributions before any final decisions are taken

22 <http://www.lga.gov.uk/Documents/Publication/NPFinspiringplanninggoodpractice1.pdf>

2.7.3 The findings of Heritage Link's survey in comparison with government guidance on community involvement and the historic environment.

Planning Policy Statement 1: Delivering sustainable development (article 43)

The Heritage Link survey shows that local authorities are sometimes failing to meet government requirements for effective community involvement as set out in article 43 of PPS1.

One of the prime concerns of heritage groups was that they are not being told about planning proposals in sufficient time to be able to respond effectively to consultations. In PPS1, the government clearly states that the voluntary and community sector should participate in developing proposals and options, and that “it is not sufficient to invite them to simply comment once these have been worked up”.²³ However, a number of heritage groups in the Heritage Link survey did feel that their contributions were making no difference to planning proposals precisely because they believe that the local planning authority had already taken its decision before consulting with the community.

The survey also highlighted a second area where local planning authority practice is falling short of government guidance. That is the failure of LPAs to provide and seek adequate feedback on consultations. Providing feedback is important because many heritage groups feel that they are in the dark and don't know whether their representations are being listened to. Seeking feedback is equally important in order to establish a true dialogue with the voluntary sector that will enable the local planning authority to gain the most from heritage groups' experience and expertise.

Government response to ODPM Housing, Planning, Local Government and the Regions: Committee report on the role of historic buildings in urban regeneration (section on Local Authorities, Strategies, Staff and Skills).

This committee's report sheds light on two issues raised in Heritage Link's survey on planning consultations affecting the historic environment and on local authority capacity.

Recommendation 6 of the Committee is that a wide public debate is required before any decisions are made to demolish historic buildings. The government agrees that it “would welcome as good practice local authorities publishing applications through local amenity societies and other avenues in order to encourage a debate about the merits of an application”²⁴

The Heritage Link survey demonstrated that local authorities are not always making the best use of local amenity societies as avenues to lead to a wider public debate over planning proposals affecting the historic environment. In fact, there is a concern that some local heritage groups are not even consulted on some of these issues. In some cases, heritage groups find out about such planning applications too late to make their representations known, let alone being able to engage the wider public in a debate.

Recommendation 8 of the Committee notes that “local authorities require well trained staff who have a good understanding of the historic environment”²⁵.

Recommendation 9 specifies that “there is a severe shortage of conservation officers employed by local authorities”.²⁶ Heritage Link's survey confirmed these findings especially by revealing the difficulties that some heritage groups experience communicating with local planning authorities on matters relating to the historic environment. The survey found not only a lack of expertise on heritage matters but also a shortage in capacity to deal with an increasing number of planning consultations.

23 Article 43, Planning Policy Statement 1: Delivering Sustainable Development, ODPM, 2005

24 Government response to ODPM Housing, Planning, Local Government and the Regions: Committee report on the role of historic buildings in urban regeneration. Nov. 2004. Government response to Recommendation 6, p.5

25 *ibid.* Recommendation 8, p.7

26 *ibid.* Recommendation 9, p.8

The government's response to these recommendations is to acknowledge the need for training and resources to build capacity, "...the Planning Directorate within ODPM are continuing to work on specific initiatives to promote the capacity of planners within local authorities."²⁷ The government also mentions the Historic Environment, Local Management (HELM). HELM was launched by English Heritage in March 2004 and aims "to provide the tools for local authorities to manage change in the historic environment with skill and confidence."²⁸

The government's response is of an outward commitment to improve the capacity of local government to deal with planning consultations relating to the historic environment with the help of bodies like HELM and the Academy for Sustainable Communities, which could play a role in training local authority staff.²⁹ Heritage Link's survey on voluntary sector experience of planning consultations was carried out nearly a year after this government response to the committee's report was published. The survey revealed the continued presence of serious holes in local authority capacity to deal with such planning consultations and that the historic environment was suffering as a result.

In summary

The Heritage Link survey revealed a disparity between government guidance and rhetoric on planning consultations and the real experience of heritage groups on the ground.

- 1 Local authorities are not meeting government objectives to consult voluntary groups early and to provide and seek constant feedback.
- 2 Local authorities are failing to facilitate wider public debate on planning matters relating to the historic environment through the avenues of local amenity societies even though this is recommended as good practice by the government.
- 3 Local authorities lack the capacity to deal with an increasing number of planning consultations and need to develop skills to communicate with heritage groups on issues relating to the historic environment. Government rhetoric that it is working to improve capacity, for example by training conservation and planning staff, has not fully materialised on the ground.

27 *ibid.* Government response to Recommendation 8. p.7

28 *ibid.* Government response to Recommendation 9. p.7

29 *ibid.* Recommendation 10 and Government response p.9

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http://www.urbanforum.org.uk/pdf_files/planning_research_0406.pdf

Heritage Link members 2006

1. Ancient Monuments Society/Friends of Friendless Churches	www.ancientmonumentsociety.org.uk/ www.friendsoffriendlesschurches.org.uk/
2. Architectural Heritage Fund	www.ahfund.org.uk/
3. Association for Heritage Interpretation	www.heritage-interpretation.org.uk/
4. Association for Industrial Archaeology	www.industrial-archaeology.org.uk/
5. Association of Diocesan & Cathedral Archaeologists	http://www.britarch.ac.uk/adca/
6. Association of Gardens Trust	www.gardens-trusts.org.uk/
7. Association of Independent Museum	www.museums.org.uk/aim
8. Association of Preservation Trusts	www.heritage.co.uk/apt
9. Association of Small Historic Towns and Villages in the UK	www.ashtav.org.uk/
10. Battlefields Trust	www.battlefieldstrust.com/
11. Black Environment Network	www.ben-network.org.uk/
12. British Archaeological Association	www.britarch.ac.uk/baa/
13. British Institute of Organ Studies	www.bios.org.uk/
14. BTCV (British Trust for Conservation Volunteers)	www2.btcv.org.uk/
15. Campaign to Protect Rural England (CPRE)	www.cpre.org.uk/
16. Cathedral Architects Association	46 St Marys Street, Ely, CB7 4EY
17. Chapels Society	www.britarch.ac.uk/chapelsoc/index.html
18. Churches Conservation Trust	www.visitchurches.org.uk/
19. Church of England Archbishops Council, Cathedrals & Buildings Divn	www.cofe.anglican.org/
20. Cinema Theatre Association	www.cinema-theatre.org.uk/
21. Civic Trust	www.civictrust.org.uk/
22. Common Ground	www.commonground.org.uk/
23. Conservation Course Directors' Forum	32 Manor Place, Cambridge, CB1 1LE
24. Conservation Foundation	www.conservationfoundation.co.uk/
25. Council for British Archaeology	www.britarch.ac.uk/
26. Council for Independent Archaeology	www.cix.co.uk/~archaeology/cia/index.htm
27. Country Land and Business Association	www.cla.org.uk/
28. Ecclesiastical Architects and Surveyors Association	www.easanet.co.uk/
29. English Historic Towns Forum	www.ehtf.org.uk/
30. Gateway Gardens Trust	www.gatewaygardenstrust.org
31. The Garden History Society	www.gardenhistorysociety.org/
32. The Georgian Group	www.georgiangroup.org.uk
33. Greenspace	www.green-space.org.uk/
34. Heritage Afloat	www.heritageafloat.org.uk/
35. Heritage of London Trust	www.heritageoflondon.com/
36. Heritage Railway Association	www.heritagerailways.com/
37. Historic Chapels Trust	www.hct.org.uk/
38. Historic Churches Preservation Trust	www.historicchurches.org.uk/
39. Historic Farm Buildings Group	www.hfbg.org.uk/
40. Historic Houses Association	www.hha.org.uk/
41. Historic Libraries Forum	www.historiclibrariesforum.org.uk
42. Historic Royal Palaces	www.hrp.org.uk/
43. Inland Waterways Association	www.waterways.org.uk/Home
44. Institute of Conservation	www.icon.org.uk/
45. Institute of Historic Buildings Conservation	www.ihbc.org.uk/
46. Institute of Field Archaeologists	www.archaeologists.net/modules/tinycontent/index.php?id=1
47. ICOMOS UK	www.icomos-uk.org/

48. Jewish Heritage UK	www.jewish-heritage-uk.org/
49. The Landmark Trust	www.landmarktrust.org.uk/
50. The Leche Trust	84 Cicada Road, London SW18 2NZ
51. Maintain our Heritage	www.maintainourheritage.co.uk
52. Museums Association	www.museumsassociation.org/
53. National Association of Decorative and Fine Art Societies	www.nadfas.org.uk/
54. National Trust	www.nationaltrust.org.uk/main/
55. Norfolk Archaeological Trust	www.norfarchtrust.org.uk/
56. North of England Civic Trust	www.nect.org.uk/info.htm
57. Open Spaces Society	www.oss.org.uk/
58. Oxford Preservation Trust	www.oxfordpreservation.org.uk/
59. The Pilgrim Trust	www.thepilgrimtrust.org.uk/
60. The Prince's Regeneration Trust	www.princes-regeneration.org
61. Queen Elizabeth Scholarship Trust	www.qest.org.uk/
62. Ramblers Association	www.ramblers.org.uk
63. RESCUE: The British Archaeological Trust	www.rescue-archaeology.freemove.co.uk/
64. SAVE Britain's Heritage	www.savebritainsheritage.org/main.htm
65. The Scole Committee	The Pleasance, Queen Square, New Buckenham, Norwich NR16 2AL
66. Society for Medieval Archaeology	www.socmedarch.org/
67. Society of Antiquaries of London	www.sal.org.uk/
68. Society for the Protection of Ancient Buildings (SPAB)	www.spab.org.uk/
69. Standing Conference of London Archaeology	http://ds.dial.pipex.com/town/parade/hp03/scola/
70. The Theatres Trust	www.theatrestrust.org.uk
71. The Transport Trust	www.thetransporttrust.org.uk/
72. Twentieth Century Society	http://www.c20society.org.uk/
73. Victorian Society	www.victorian-society.org.uk/
74. The Vivat Trust	www.vivat.org.uk/
75. War Memorials Trust	www.warmemorials.org/
76. Waterways Trust	www.thewaterwaystrust.co.uk/
77. Wessex Archaeology	www.wessexarch.co.uk/
78. The Woodlands Trust	www.woodland-trust.org.uk/
79. World Monuments Fund in Britain	www.wmf.org.uk/
80. Youth Hostels Association	www.yha.org.uk/

> Influencing policy

> Underpinning advocacy

> Building capacity

About Heritage Link

Heritage Link was set up in 2002 by national heritage groups to promote the central role of the voluntary movement in the sector and to make their voice heard collectively and coherently.

Heritage Link brings together over 80 voluntary organisations concerned with heritage in England representing interests from volunteers to owners, specialist advisers, practitioners and managers to national funding bodies and local building preservation trusts. Much of the historic environment is cared for – supported, managed or owned – by these organisations. They are supported by some 4 million members making it the biggest alliance of heritage interests in England.

Heritage Link provides a forum for members to formulate and promote policy on core issues as well as a support and information network. A significant means of communicating information throughout the sector is Heritage Link Update, the fortnightly e-bulletin now reaching an estimated 7,500 mailboxes including local, regional and central government as well as a wide spectrum of voluntary organisations.

The **Making Consultation Matter** project was undertaken by a special Task Group of Heritage Link members meeting during 2005-06 under the supervision of the Heritage Link Working Group on Land-Use Planning. The Civic Trust, Council for British Archaeology, Campaign to Protect Rural England (CPRE), National Trust, and SAVE Britain's Heritage comprised the Task Group.

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