



Historic England

DCLG Consultation on the Homes and Communities Agency

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

We welcome the opportunity to submit a response on the following questions.

1. Are the purpose and priorities of the HCA clear to you and correct for the future?

- The overall purpose of the Homes and Communities Agency is clear. Having a single body as the lead for encouraging housing provision across the country helps to give consistency across the country which benefits the wider sector as well as providing economies of scale which benefit individual communities. Given the wider proposals in the Productivity Plan and the Housing and Planning Bill to encourage public sector land release, it is all the more important to have a single point of oversight and coordination if the benefits of this land release are to be fully realised.
- That said, the range of the HCA's functions to support the overall purpose (sale of land, assistance to LPAs, investment, delivery of affordable housing, etc.) is very varied and as a result the HCA's involvement with particular sites can initially be opaque.

2. How effectively does the HCA carry out its functions and how could it do so more effectively to meet future challenges?

- Historic England has considerable experience of working with the HCA on particular projects. The reuse of historic buildings and brownfield sites for housing has attracted funding from the HCA and we welcome this as an effective mechanism for unlocking the sustainable development of these places.
- Against a background of shrinking Local Authority resources in planning and development management, we have also found the ATLAS service to be a highly valuable source of national capacity and expertise to help LAs deliver large-scale developments, on both public and private land. Their multidisciplinary approach, specific to the needs of individual schemes, adds value throughout the process prior to determination. Such national capacity enables LA planners to apply their expertise to assessing the general planning implications of such large scale development, including on the historic environment. Without this input many LPAs would not have the relevant expertise. In those projects where both ATLAS and our Planning teams have been involved, we consider that their involvement contributed to the positive outcomes. In our view therefore it will be important to retain ATLAS' capacity and expertise to support local authorities in such complex cases in the future.

3. How effectively does the HCA work with customers and partners?

- The HCA's remit has a considerable interface with Historic England's remit for the Historic Environment. We do meet with representatives of the HCA at both national and regional levels to discuss strategic matters. Such meetings have remained intermittent rather than developing any strategic partnerships and we feel that there is potential for improvement in this area. We already work closely with other government departments and agencies in the context of the Protocol for the Care of the Government Historic Estate. We help them with their own disposals programmes as well as giving advice on the application of the NPPF and other government guidance on the care and disposal of heritage assets.
- Regarding particular developments, the picture is mixed, reflecting regional differences, the varying characteristics of particular sites and the varying role which the HCA may have with a particular site. Past grant schemes (particularly the now-closed Empty Homes Programme) have permitted investment in historic buildings to provide affordable housing and, as result, have contributed to tackling Heritage at Risk. More recent changes to funding schemes have reduced the potential for such multiple benefits and we would welcome a renewed focus on investment in existing building stock.

4. What skills does the HCA require for the future and, from your experience, does it have these?

- Proper consideration of the historic environment in planning the sale and development of sites gives the greatest opportunity to utilise this heritage to make truly distinctive sustainable communities. We welcome the HCA's investment to de-risk publically owned sites prior to disposal to market and we recognise that, if not considered from the outset, the management of the historic environment can represent an area of risk to a development. Historic England is expert at helping to make the most of a place's heritage and to find solutions to minimise such risk. In our experience, owners and developers working with heritage assets are greatly assisted in this by procuring specialist historic environment expertise which can work within the organisation from the outset to take full advantage of the opportunities these assets can offer.

5. What is your view of how efficient the HCA is in delivering its objectives and can you suggest ways this could improve?

- We would welcome closer working with the HCA both on a strategic level (particularly on public land disposals and investment) and in relation to specific developments and investments where clarity of HCA's involvement in the specific instance could be improved. As a government agency dedicated to housing development, the HCA can set an example for the sector in demonstrating the benefits of early engagement with other agencies to achieve successful housing developments which help to create and sustain successful communities.
- We recommend that the HCA should only support developments following an assessment of potential impacts on the historic environment, or Sustainability Appraisal or Strategic Environmental Assessment. Otherwise poor and inefficient decision-making is likely to result with the risk of considerable abortive costs since

heritage (and other) considerations are best assessed well before they are the subject of statutory consultations.

6. Is there any other feedback on the HCA that you would like to provide to the review team?

- Historic England's Enhanced Advisory Services (EAS) have been specifically designed to assist with managing development affecting the historic environment and closer working through our EAS or service level agreements would assist the HCA in achieving its goals. Similarly, while local Historic Environment Records remain a vital source of information on the historic environment, Historic England holds historic environment data with national coverage which can be used in understanding particular sites as well as planning larger programmes of disposal and development.

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