



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

House of Commons Communities and
Local Government Select Committee

Via e-mail

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Dear Sirs

OPERATION OF THE NPPF

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

Thank you for inviting us to submit evidence. We have little we can say on the main thrust of the 3 key areas under current scrutiny but we would like to make a general point about the both the NPPF and the structure of the Inquiry, and some more detailed points about the contribution that the historic environment can make to two of the areas of scrutiny.

As mentioned above, the principal interest of the IHBC is the historic environment. But it is very clear to us that the historic environment forms part of an environmental, social, economic and cultural context within which many parts of everyday life have to operate.

The problem that the NPPF creates is that it compartmentalises aspects of planning into topics which, no matter how much cross-referencing is undertaken, does mean that the need for holistic vision and approaches tends to be forgotten. Notwithstanding the urgency of the Inquiry's areas of particular scrutiny, we would not wish to see the Committee's deliberations ignore the contribution that the historic environment can make to two of them.

Planning for housing

There is much debate about the adequacy of the planning system in delivering the housing that the Nation needs. But it should be remembered that the vast majority of the housing that will exist in 25 years time exists now; much of it is of traditional

construction and some contributes considerably to the Nation's heritage and sense of cultural well-being.

The older housing stock thus has a considerable contribution to make in meeting future demand. But it needs to be treated properly if it is to do so. Firstly, it needs to be properly maintained, repaired and, where appropriate, modernized. The IHBC is on record as having grave misgivings about the impact of the Green Deal and the application of modern maintenance and repair techniques to buildings of traditional construction. Too often, these lead to the rapid deterioration of fabric which completely negates the anticipated benefits of renovation or improvement. It is not that sound techniques do not exist. They do; but they are not being consistently used, largely thought lack of understanding of the need for them, poor training in the building industry and aggressive selling of inappropriate modern building components, materials and techniques.

Any solution to the housing crisis, therefore, needs to apportion an appropriate role for the existing traditional housing stock and devise ways of improving it so that its future is properly secure.

A second point in relation to heritage housing is that its value, and therefore its future, is tightly wound up in its having popular appeal as housing, which in turn is often affected by its location and siting. This can be adversely affected, in a planning context, by inappropriate neighbouring development. Thus, where there are new dwellings to be built in historic contexts, it is important to ensure that the new development does not, inadvertently, detract from the character of the area and thus diminish values in the area as a whole.

Proper contextual analysis of development proposals in a historic setting is not a mere procedural encumbrance. It is needed to ensure that the housing stock as a whole retains its economic and social value.

Town Centres

Our submission on this aspect has close parallels to our point about historic housing stocks.

Many of the most successful town centres are historic ones. These tend to have a number of features which makes them stand out from the run-of-the-mill "clone high street" that the rise of the chain store has made ubiquitous:

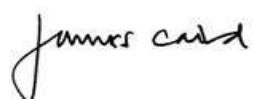
- a wide mix of uses;
- independent traders;
- an interesting townscape;
- local and community events;
- tourist footfall.

Our simple point is that it is often the nature of the historic environment in a town centre that most contributes to its success. This is a feature of modern retailing which needs to be built upon through careful planning and not undermined by one-size-fit-all approaches to retail planning policy. Again, the proper contextual analysis of planning applications in historic town centres is key to getting things right.

Continued/

We hope these comments are helpful to the Inquiry.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large initial 'J' and a long, sweeping underline.

James Caird
Consultant Consultations Co-ordinator