



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Planning Conditions Consultation
Communities and Local Government
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19 March 2010

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Dear Sirs

IMPROVING THE USE AND DISCHARGE OF PLANNING CONDITIONS

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 participate in this consultation.

The Institute generally supports the approach taken by the consultation. In particular we are pleased to support:

- the retention of the 6 tests;
- the listing of approved plans;
- the structuring of decision notices;
- the general caution on the use of conditions precedent, although we would wish also to see our comments on Policy CO19 adopted.

Policy CO5 relates to the third test, relevance to the development to be permitted. The Institute believes that the existence of standard conditions can undermine a proper approach to conditions relating to historic assets. We feel that an additional paragraph could point out that where there are issues arising from the specific nature of the case, such as materials and techniques for works to historic buildings, conditions should be carefully worded or require the submission of method statements.

The Institute supports Option B at Policy CO18. We feel that there are circumstances in which this is appropriate. These include cases where the principle of the reuse of a

historic asset is being decided but where the applicant intends to sell on the proposal to a specialist developer. We agree with the proposed restrictions as set out.

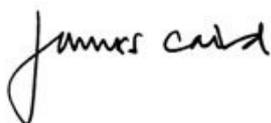
The Institute does not agree with Policy CO19 as drafted. We think that cases involving works to sensitive historic assets, the further submission of method statements, the construction of sample panels etc. is essential. As drafted this principle rather implies that such circumstances should be exceptional. We feel that the paragraph would be better worded "Unless the level of submitted detail is insufficient to secure a satisfactory quality of development, authorities should seek to ensure that conditions...".

Policy CO22 appears to rule out the severance of discrete aspects of the proposal by condition. This is a useful device in cases involving historic assets where alterations to one part of the building may be acceptable but not those in another.

Policy CO26 does not appear to differentiate between planning and listed building cases. We would wish to see the principle that fees are not payable in listed building cases perpetuated in this provision. We accept that in cases where planning permission and listed building consent are required these fees would be payable.

We have one further concern about the implications of these proposals. This is that they will require additional resources at a time of serious financial constraints on LPAs. Some of these resource implications should, in theory at least, be reduced by the implementation of a more streamlined and transparent regime, but the transition will be difficult for many LPAs.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive, slightly slanted style.

James Caird
Consultant Consultations Co-ordinator