



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Large Digital Screens Consultation
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Dear Sirs

LARGE DIGITAL SCREENS

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The Institute is generally pleased with the draft Guidance which we think will be helpful. We do, however, have 3 issues we would like you to look at.

1. It is very unclear what is meant by the expression "plan-led approach". This term normally means dealing with issues through the medium of well considered policy in development plans. But in terms of the Guidance it clearly does not mean that because, as the Guidance notes, the timescales are too pressing to allow the several years it would normally need for proper plan policy to pass through all its LDF stages.

We think it would be appropriate for LPAs to develop interim policy documents for the purpose of assessing the impacts of LDSs by reviewing (as suggested in the Guidance) all the existing policy that might apply and setting out clearly their approach to its interpretation and use in this context. The section on Policy and Precedent in the Guidance appears to be about to suggest this but quickly becomes diverted into the assessment of individual proposals. We think a separation of these two aspects would be useful.

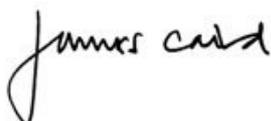
2. Our second point relates to the disbenefits of LDSs. It seems to us that the driving force for many screens will not be the public benefit but the commercial potential of advertising, particularly in areas like conservation areas and other designated areas where advertising is normally more restricted. We would not wish to see a proliferation of sites where the lure of the occasional broadcast of cultural and community

significance gives rise to an all-day, every-day stream of news feeds and commercial advertising, through largely commercial funding arrangements. We applaud your section on Planning Permission which advises against commercial advertising but feel that there could be additional advice about being wary of proposals that are presented as commercial propositions.

3. Most importantly we request that you take legal advice on the impact of the Town and Country Planning (Control of Advertisements) Regulations 1992 on this Guidance as regards Areas of Special Control of Advertisements. A few Conservation Areas are Areas of Special Control, the requirements for which appear to preclude the sorts of advertising commonly appearing on LDSs, and current Guidance in PPG19 suggests that Conservation Area status may in some circumstances be a justification for ASC designation.

We hope these comments are helpful.

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