



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

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Dear Sirs

## **PLANNING FOR PROSPEROUS ECONOMIES**

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The Institute considers the draft Guidance generally to be an appropriate updating of guidance on economic development and we welcome the prospect of further guidance on the remaining parts of PPG7 left in force.

We do have some concerns, however, about the few references to the historic environment considering that this is a major factor in the planning of many town centres and rural areas and that it has been shown that high quality historic environments can be a major driver in the regeneration of local economies.

Fortunately we think that the structure of the draft Guidance is good enough that our points could be well made with a few wording changes (most of them minor) which we suggest below.

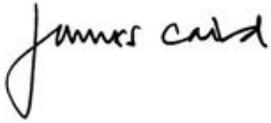
1. In paragraph 6 (Government's objectives) historic environment is referred to but only in respect to "centres". As centres are tightly defined in paragraph 5 for the purpose of constraining the pattern of retailing, this means that there are no apparent objectives for heritage-led regeneration other than in centres as defined. This could be remedied by adding words to the 5<sup>th</sup> bullet point: "promote high quality and inclusive design, maintaining and improving the quality of the public realm, open spaces and historic areas".

2. Policy EC1 - The evidence base requirements concentrate on needs and delivery and do not refer to any form of capacity study. The Institute thinks that the evidence base should include a review of constraints, so that lower levels of capacity for change arising from historic environment, flood risk and any other environmental concern, can be taken in to account in the distribution of new economic functions. In Appendix B (definitions) we ask for the section "Distinctive, economic and property challenges" to include "potential for heritage led regeneration".
3. Policy EC2.1.3 - add "or the potential for heritage-led regeneration".
4. Policy EC3.1.2 - add "and environmental sensitivity".
5. Policy EC4.1.8 - add "and areas" after historic buildings and add (at say EC4.1.8a) "promote economic regeneration by building on existing environmental capital such as areas of historic environment, parks and other areas of existing or potential quality of townscape".
6. Policy EC4.2.1 - add "or the potential for heritage-led regeneration".
7. Policy EC5.1.8 - add a section "examining the capacity of historic areas to accept change and using such potential to consolidate high quality townscapes".
8. Policy EC6.1.6 – we support the policy.
9. Policy 7.1.6 - after "previously developed sites" add "the potential for heritage-led regeneration".
10. Policy EC9.1 - we support the policy.
11. Policy EC10.2 - add "the need to preserve and enhance the visual character of historic environments and other high quality townscapes."
12. Policy EC12.3.4 - add "or preserves and enhances historic buildings and areas".
13. Policy EC12.3.7 – add the words "maintaining or" before the word "improving".
14. Policy EC14.1.6 – we are concerned that this policy might give rise to pressure to replace rather than convert buildings of heritage value for commercial reasons disguised as sustainability ones. We suggest the words "without heritage merit" might be inserted after the words "replacement of buildings".
15. Policy EC15.1 - add a section "recognise the potential of historic environments to provide economic regeneration".
16. Policy EC16.1 - add "World Heritage Sites".
17. Policy EC17.1.2 - add "the scale and design of the parking will preserve and enhance the visual character of historic environments and other high quality townscapes."
18. Policy EC18.4 - add "and how a high quality of design is to be achieved".
19. Policy EC19.1.1 - add "including sites which incorporate existing or historic fabric".
20. Policy EC20.1.1 – after "wider impacts" add "both economic and physical".
21. Policy EC20.1.3 - add the words "maintaining or" before the word "improving".
22. Policy EC22.1.1 - should require reference to the impact criteria at EC20.1.3.

23. Annex A – add “A15. The extent of heritage capital such as listed buildings, conservation areas (including their appraisals and management plans) and any other existing or proposed scheme of environmental enhancement.”

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 style with a large, looping initial 'J'.

James Caird  
Consultant Consultations Co-ordinator