



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Priority Regulatory Outcomes
Consultation
Local Better Regulation Office
The Axis
10 Holliday Street
Birmingham
B1 1TG

James Caird
Consultant Consultations Co-ordinator
IHBC Business Office
Jubilee House
High Street
Tisbury
Wiltshire
SP3 6HA

6 May 2011

Tel (01584) 876141
Web site www.ihbc.org.uk
E-mail consultations@ihbc.org.uk

Dear Sirs

PRIORITY REGULATORY OUTCOMES

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.

Given the very specific focus of the consultation, the Institute is unable to comment in detail on the analysis in the Paper. All the priorities listed are key to the health and wealth of the nation and have widespread support for their implementation.

However the reason for this response is that we would not wish the emerging national priorities to be adopted in a way that implies other environmental regimes have little or no value.

We are particularly concerned with regulatory regimes connected with the historic built environment, planning and building control. Although these are not directly subject to the Review, they are frequently impinged upon by works required to implement compliance with regulatory requirements that are subject to the consultation. We think a reference to the need to comply with these regulatory regimes should be made earlier and more prominently in the document than the second page of Annex 1.

1. Do the draft priority regulatory outcomes accurately address the regulatory issues and risks facing England?

Yes, but only within the terms set by the consultation, the limited scope of which should be more prominently described.

2. Are they suitably focused on emerging issues and future threats?

We have no complaint about the focus other than the fact that some issues, e.g. climate change, have internal policy balances to be made, let alone balances with overlapping interests. We think that any emerging Guidance should reflect this and state clearly that it does not absolve the Regulatory Body from the need to comply with all statutory regimes.

3. Are outcome-focused priorities the most effective way to promote local discretion and meet the needs of local people, whilst providing a framework to meet national needs, such as support for economic growth and the protection of vulnerable citizens?

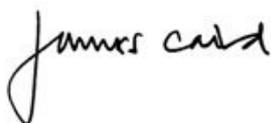
Outcome-focused priorities should not imply a lessening of requirements for compliance with other statutory regimes which fall within the definition of "national needs" but are not included within the examples given in the question, such as cultural capital.

4. Should the term 'priority regulatory outcomes' replace 'national enforcement priorities' to denote the list for English local authorities referred to in section 11(1) of the Regulatory Enforcement and Sanctions Act 2008?

The Institute supports this proposal on the basis that it seems to imply a more balanced approach to regulatory regimes.

We should be grateful if these comments could be taken into account.

Yours faithfully

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

James Caird
Consultant Consultations Co-ordinator