



INSTITUTE OF HISTORIC BUILDING CONSERVATION

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Dear Madam

Standard Application Form Consultation Paper

I refer to the above consultation document.

The Institute of Historic Building Conservation is the professional body for 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.

The Institute would make the following responses to the questions posed in the consultation document:

Standard approach to handling planning applications

Q1. Do you agree with the principle of introducing a standard approach to handling planning applications?

The IHBC agrees with the introduction of a standard approach, providing it reflects the standards of the best local planning authorities rather than average standards.

At present, the suggested forms set a lower standard for validation than some local planning authorities. For example, there is no requirement for a Conservation Plan other than for demolition, or for impact statements for works to listed buildings. Design and Access Statements appear to be optional (despite the ODPM's current consultation on design and access statements). There is no requirement that existing and proposed plans, elevations and sections should all be to the same scale of 1:50, or details at 1:10 or 1:1 as appropriate. There is no requirement for archive or historic drawings or archaeological survey information to help demonstrate the evolution of the building and site.

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Content of standard application form

Q2. Are we asking appropriate questions on the application form?

Householder, demolition in a conservation area and listed building consent

The box relating to works to a listed building (Question 1) does not include an option for making alterations to the exterior of a listed building.

At Question 6 (Materials), for listed buildings it may also be necessary to specify materials used for internal alterations.

At Question 7, the cubic content of a building at the time of listing will often not be known.

There should be a question relating to the justification of demolition under PPG15 criteria, probably under Question 8. In addition, the form should recognise that demolition is also a concern for conservation area consent (and the same PPG15 criteria apply).

Question 10 should include an option for *other alterations*.

The gradings at Question 11 are in the wrong sequence. Grade II* is a higher grade than grade II. Ecclesiastical is not a grade and fits oddly into the sequence of boxes.

Question 12 appears to deal with similar matters to Question 6. The two should be merged.

The guidance on site visits should make clear that access to the interior of listed buildings may be necessary.

Full/Outline Application

The form makes little reference to listed buildings or conservation areas. These matters are just as important for planning applications as for applications for listed building consent or conservation area consent.

Minerals and Associated Waste Applications

Checklist E needs to include statutorily protected buildings and areas.

Q3. Do the questions appear in logical sequence?

See above comment on Questions 6 and 12 of the householder/listed building/conservation area form.

Q4. Is there any vital information missing which would prevent a local authority from making a decision?

Supporting information will be necessary to accompany applications for the demolition of listed buildings or buildings in conservation areas, responding to the criteria contained in PPG15.

See comments at Question 1 above and 6 below

Q5. Are there any specific questions which should be included or excluded?

See question 2 above.

Q6. Planning authorities may need to seek supplementary supporting information for example, on flood risk areas and World Heritage Site impact. Do you agree that these are the right categories? Are there others?

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See comments at question 1.

The IHBC strongly recommends that Conservation Plans or statements be required for Listed Building Consent applications. These should comprise a two stage assessment - of significance and impact. Conservation Plans or statements can be as long or as short as is necessary to deal with the key matters arising from the assessment and the proposals.

Where this requirement has been introduced by Local Planning Authorities, the evidence is that the quality of both applications and the proposals themselves demonstrably improve. The resourcing of the assessment is transferred from the local authority to the applicant. A key advantage is that the applicant must do the assessment as part of the design process prior to the application, whereas with the orthodox approach the assessment is done by local authority officers as part of the application process. The requirement for a Conservation Plan or statement provides for more informed proposals, applications and decision making whilst reducing the burden on scarce officer resources. These reforms, together with the work being undertaken by English Heritage on list descriptions, would play a key role in raising the standards of development affecting the historic environment. It would simultaneously deliver speedier and higher quality decision making by local planning authorities.

Q7. Are the guidance notes comprehensive and easy to read?

The term 'curtilage' needs to be defined and explained.

It should be made clear that the term listed building includes structures.

Guidance notes on the expected quality of plans should be included. These should make clear that larger scale plans are required to indicate the detail of alterations to listed buildings. For new build development, sections and larger scale plans are necessary to demonstrate that attention has been paid to the quality of detail and finish, for example showing the articulation of joints, modulation in elevations, design of balconies, etc. Without such details, many design decisions are left to the building contractor rather than the architect or the local planning authority, with potentially disastrous consequences for the quality of the development and its contribution to the urban context or impact on historic buildings and areas.

It would be useful to include advice on the selection of architects/designers. Problems most often occur where applicants have selected designers that lack the necessary skills in urban design, architectural design or conservation.

Q8. Do you have any comments on the on-line consultation process? Standard application form 12

No comment.

Broader issues

Q9. Should 1 APP be introduced by staged or full national implementation?

It would be advisable to pilot the forms in a selection of local planning authorities before general introduction.

Q10. How long would local planning authorities need to prepare for implementation of 1 APP?

To avoid wastage of paper associated with disposal of existing forms, the IHBC would recommend that at least 12 months be allowed for implementing the new forms.

Q11. How long would local planning authorities need to prepare for full implementation of electronic working?

To allow proper planning and budgeting, 12-18 month is recommended.

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Q12. Should we consider the reduction of fees for on-line submissions?

On-line submissions are unlikely to result in any savings for local planning authorities and may in fact be more costly as plans would need to be printed off for site visits, consultations, etc. In addition, there would be considerable resource implications for local planning authorities and statutory consultees in introducing on-line submission facilities. These would include both equipment and training costs. Both will need the facility to view more than one drawing at a time. There is no case for reducing fees for on-line submissions.

Q13. To what extent and how should the standard form seek information to be used for policy monitoring?

No comment.

Q14. Is there a need for a separate waste form?

No comment.

I trust that the above comments are useful.

Yours faithfully

A handwritten signature in black ink, appearing to read 'D. Chetwyn', is written over a light grey rectangular background.

Dave Chetwyn
Vice Chair