



INSTITUTE OF HISTORIC BUILDING CONSERVATION

Communities England Team
Communities and Local Government
2/14 Eland House
Bressenden Place
London SW1E 5DU

10 September 2007

Dear Sir/Madam

DELIVERING HOUSING AND REGENERATION: COMMUNITIES ENGLAND AND THE FUTURE OF SOCIAL HOUSING REGULATION

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.

The Institute welcomes the opportunity to comment on the Consultation Paper.

The Institute broadly supports the proposals for Communities England in principle. We are committed to the delivery of place making and regeneration where this has respect for the historic environment. In particular, we promote a positive role for the historic environment in achieving these aims.

It was disappointing to us that nowhere in the Consultation Paper were heritage issues mentioned specifically, although we were pleased to see a whole section (section 5) devoted to the principles of place-making. We were also pleased to see repeated references to partnership working with local communities and other bodies and organizations. We would wish to see the specific remit of Communities England extend to place-making based on established places and communities bringing together all their assets, including heritage assets.

General. The Institute does not wish to respond to all the questions posed in the Consultation individually. It thinks there is merit in placing the development, funding and regulatory roles in a single body as this will allow best use to be made of resources. Our only concern is that such a large organization might tend to become remote from local delivery and community mechanisms and it is important that its duties in these respects are clearly defined.

Questions 6 and 7. The Institute is keen to see an enhanced role for the Academy of Sustainable Communities. There would appear to be benefits in giving the responsibility for ASC to Communities England, but only if that responsibility clearly led to adequate support and development for the ASC which allowed it to be independent of, and, if necessary, critical of, Communities England. If there is a danger that ASC might become subsumed into Communities England, it would be better for it to be an independent organization.

Question 8 The Institute believes that decision-making should be at the most local level compatible with good decision-making practice. It prefers, therefore, the retention of the UDC model over a centralized one based in Communities England.

Question 9 The Institute hopes that Communities England would work with Local Authorities, in both regeneration and planning roles, in line with best practice recommended for all developers and landowners. Where proposals involve heritage issues, either directly or indirectly, the Institute would wish to see all the appropriate local resources applied to identifying issues and finding solutions.

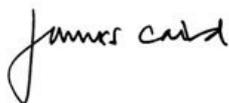
Question 14 One shortcoming of the existing financial model is its frequent failure to provide flexibility in cases where existing communities (often with historically significant fabric) are involved in regeneration schemes. Given the Government's objectives of achieving quality place-making and building and reinforcing mixed communities, the Institute feels that this opportunity could be used to develop the model so that it better values the cultural and embodied resources of historic and other existing places and funds what is needed to achieve results of real quality.

Question 15 The Institute supports the proposal that Communities England should seek and develop partnerships at local level for delivery of as much of its programme as possible.

Question 17 Many past housing and regeneration schemes have failed in the long-term because they did not have proper community roots. There is a danger that Communities England might find meeting its quantitative targets easier than meeting its qualitative ones. While it is clear that Communities England cannot have more than one master, the importance of local engagement in, and accountability for, its projects cannot be overemphasized.

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

Yours faithfully



James Caird
Consultant Consultations Co-ordinator
Glebe House
Caynham
Ludlow
Shropshire
SY8 3BN

(01584) 876141
consultations@ihbc.org.uk