



## INSTITUTE OF HISTORIC BUILDING CONSERVATION

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Dear Ms Amery

### **Best Value Indicators and Performance Standards 2004/05**

I refer to the above consultation document.

The Institute of Historic Building Conservation is the professional body representing conservation specialists and practitioners in the public and private sectors in the United Kingdom and the Republic of Ireland. It has around fourteen hundred members divided between fourteen branches. 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 most important issues when considering best value indicators and performance standards are resources and recruitment. There are clearly substantial resource implications to implementing the new Planning and Compensation Bill. In addition, many local authorities are already experiencing problems in recruiting adequate levels of appropriately qualified, experienced and specialised staff. If performance is to improve in any meaningful way, the problems of resourcing and recruitment need to be robustly addressed.

The IHBC welcomes the recognition that best value indicators have concentrated only on process in the past, and now need to be extended to cover quality of outcomes. It has become clear over the past few years that concentrating on speed of decision making in particular has led to a significant erosion in the quality of planning decisions, and that this had detrimental impacts on a range of economic, social and environmental matters. There is increasing concern among many of the Institute's members that a number of local planning authorities have indeed lowered standards, especially since the planning grant has been based on speed performance indicators. In other instances, there has been a tendency to increase the refusal rate, rather than lower quality standards, due to the lack of time to negotiate improvements and secure added value. This manifests itself in the increase in the number of appeals being dealt with by the Planning Inspectorate over the past few years. The consultation paper begins to address these issues, but it is hoped that future best value reviews will introduce much more radical changes to move towards a qualitative approach.

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A possible way forward would be to adjust the time allowed for applications where improvements or amendments have been requested in writing by the local planning authority. Where additional plans, information or amendments are required, the clock should stop ticking until the applicant provides them. Another alternative would be to increase the time allowed to deal for applications in a wider range of cases, such as applications affecting the setting of historic buildings. Ultimately, it would be better to relate the planning grant to qualitative issues (outcomes - such as degree of compliance with a quality of service checklist) in addition to processes.

In respect to the specific content of the consultation paper, the IHBC would make the following comments:

### **BV(x1) PERCENTAGE OF APPEALS ALLOWED AGAINST THE AUTHORITY'S DECISION TO REFUSE**

The IHBC is concerned that this performance measure could lead to poorer quality decisions. Whilst a reduction in the number of decisions being overturned on appeal could be indicative of better decision making, it could equally be indicative of a lowering of quality standards by the local planning authority, refusing only developments that are so abysmally poor that they would almost certainly be rejected on appeal. Any substantial drop in the number of appeals being overturned would be a matter for considerable concern, almost certainly indicating a lowering of standards. If this indicator is introduced, it should be as a range with both maximum and minimum targets.

### **BV(x2) QUALITY OF SERVICE CHECKLIST**

The IHBC welcomes the introduction of a checklist in principle and agrees with the suggested six matters for inclusion on the list. However, the wording will need to be adjusted and tightened to ensure that the items on the checklist are adequately addressed by robust action rather than token gestures.

For example, item 3 (access to specialist advice on design) and item 4 (access to specialist advice on the historic environment) should make clear that such advice should be readily available on a day-to-day basis and should be provided by fully qualified design and conservation specialists. The reference to CABE and English Heritage could be misconstrued, allowing local authorities to tick the 'yes' box on the basis of consulting such external bodies rather than having properly contracted, regular advisers. Whilst the value of advice from these bodies is not in question, neither organisation has the resources to intervene in specific local authority areas as a replacement for a properly resourced local service. They can only be involved in a small proportion of casework, concentrating on the most significant schemes.

Under item 5 (development team), the range of skills required on such teams should be clearly specified.

### **PROPOSALS TO DELETE BVPIs**

The IHBC supports the proposed deletion of BV107 and BV 188.

As you will be aware, a representative from ODPM (Mr Rob John) has participated in recently completed research leading to the definition of four key performance indicators for the historic environment. The other participants were the IHBC, DCMS, English Heritage, ALGAO, the Planning Officers Society, the Audit Commission and the Local Government Association.

These indicators relate to Local Authority Heritage Assets, Conservation Area Appraisals, Historic Environment Records, and User Satisfaction and were prepared in anticipation of possible introduction in 2005-6. They have the full support of this Institute. The indicator related to User Satisfaction would relate in part to the present BV(x2) QUALITY OF SERVICE CHECKLIST.

I trust that these comments are helpful.

Yours sincerely

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Dave Chetwyn  
Consultations Secretary