



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

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By e-mail

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Dear Sirs

### **THE FUTURE OF CIL**

The Institute of Historic Building Conservation (IHBC) is the professional body for building conservation practitioners and historic environment experts working in England, Northern Ireland, Scotland and Wales, with connections to the Republic of Ireland. The Institute exists to establish, develop and maintain 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 IHBC, being a professional body and not being directly involved in CIL, has little to contribute to most of the topics set out in the far-reaching questionnaire.

However we would like to make one point that no doubt will also be made by others. This is a simple but key point:

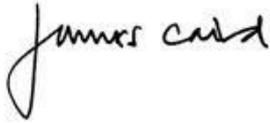
The CIL, as a betterment tax, raises considerable funds for LPAs (and Parish Councils, where there is a neighbourhood plan in place) in high growth parts of the country. Such areas are often characterised by inflationary pressures on land. The CIL raises little or nothing in areas where the land economy is weak (sometimes a zero rate CIL is being set in recognition of this). Therefore, CIL is ineffective as a stimulus for growth in such areas or as a means to making the reuse of vacant buildings or development of land more viable, and merely stokes the geographical imbalances in the economy, rather than contributing to any geographical rebalancing.

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Viability is a key issue in many parts of the country and improvement of infrastructure is one of the ways of making schemes more viable and attracting investment. This is not a simple north/south or regional issue. Viability can vary considerably, even within a single district. Needless today viability and infrastructure requirements do not go naturally hand-in-hand. The geographical spread of areas recently affected by flooding show this all too plainly.

Thus if the CIL cannot be adjusted to deliver what it purports to everywhere, it should be replaced with policies that work across the country and which contribute to economic rebalancing and fairness for all parts of the country.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive, slightly slanted style.

James Caird  
Consultant Consultations Co-ordinator