



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

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Dear Sirs

#### **REVIEW OF CALL-IN DIRECTIONS**

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.

The Institute supports the consolidation of the Directions into a single Direction as this will improve the clarity of the call-in process. The Institute also supports the tighter requirements for notification. While it is important that unnecessary notifications are minimized, it is also important that the Secretary of State hears about the most important cases.

In relation to the content of the proposed new Direction we comment as follows:

**Playing Fields** can represent a significant feature of the setting of listed buildings and form a major component of the character and appearance of conservation areas. The Institute supports the additional scrutiny given to their proposed development through the Direction. We therefore support the continuation of the current wording in the new Direction.

**The Green Belt** is a similar asset, particular where it affects historic cities, such as Oxford, Cambridge and York, but also smaller settlements of historic significance in the Green Belts of major urban areas. The Institute therefore supports the continuation of the current wording in the new Direction.

**Flooding** will continue to have real and potential impacts on historic assets and settlements many of which are vulnerable because of their location on coasts and inland waterways. We therefore support the continuation of the current wording in the new Direction.

**Departures from the Development Plan** will continue to need to be notified. The critical question is that of the thresholds that will apply. An issue for many historic towns is the threshold for retail development, which can have significant impacts on viability and thus, ultimately on character and appearance. The effect of withdrawing the general Shopping Development Direction is to emphasize the much lower threshold currently in the Development Plan Direction. The Institute supports this. The fact that it will only apply to departure applications is acceptable as all others will have been considered in the LDF process.

We support the withdrawal of the notification requirement for all land owned by the local authority for lack of relevance to planning and the requirement for other "prejudicial" development for vagueness.

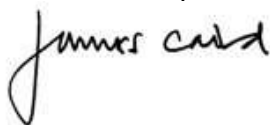
However, the Institute has concerns about the proposed withdrawal of a housing component in the proposed new Direction. While the need to provide sufficient housing for the nation is of primary importance, doing this in a way that does not adversely affect environmental assets, including heritage ones, is also important. The cancellation of the Greenfield and Density Directions has removed the ability to distinguish between housing developments by those means. Bearing in mind that housing developments of 150+ units can have considerably greater impacts than other developments for which notification is being retained, the Institute feels that a housing criterion for notification should be included in the Direction.

There is no indication in the consultation document of the breakdown of the 786 referrals under the Directions. We are unable to judge, therefore, whether retention of the housing component of the Direction would perpetuate a significant workload for Government Offices. If this is the case, an alternative preliminary procedure might be to require a consultation with the Regional Assembly or Mayor of London on the lines of the trigger mechanisms for flooding and heritage.

**Heritage.** The Institute feels that the proposals for the Direction of World Heritage Sites may not be sufficiently fail-safe bearing in mind the critical importance of such sites. This is because the proposal, as worded, does not allow for cases in which a failure to consult English Heritage may have occurred. We suggest the Direction be framed so as to require notification unless English Heritage have been consulted and issued a statement of no objection, whether or not following negotiation and amendment.

The Institute should be grateful if these points could be considered.

Yours faithfully

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

James Caird  
Consultant Consultations Co-ordinator