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Dear Sir

Consultation on Culture and the Night-time economy Supplementary Planning Guidance

The Institute of Historic Building Conservation 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.

We are very pleased to have the chance to comment on the Culture and the Night-time economy Supplementary Planning Guidance.

The Institute's comments are as follows:

IHBC welcomes the Supplementary Planning Guidance (SPG) which provides a working framework for collaboration between Local Authorities, night-time industries, London Transport providers, the Metropolitan Police, the Nighttime Commission and the public in the interests of balancing competing concerns to achieve a positive thriving 24 hour City of London. IHBC agrees that in all forms, balances must be struck and activities coordinated so culture and the night time economy can flourish and co-exist with other uses.

IHBC understands that the SPG gives practical advice for those preparing, scrutinizing or contributing to planning policy, masterplans or planning applications relating to London's Culture and the Night Time Economy and that it aims to give local authorities and other strategic and local partners matters to consider, as a starting point for finding individual solutions to

address local situations. This SPG gives a clear explanation as to how policies in the London Plan should be carried through into action.

IHBC agrees that many pubs are steeped in history and are part of London's heritage and that an individual pub can be at the heart of a local community's social life in providing a local meeting place, a venue for entertainment and a focus for social gatherings. The NPPF 14 advises that planning policies and decisions should plan positively for the provision and use of community uses including pubs and IHBC agrees with and wishes to reinforce that policy.

From this SPG the fact that Public houses fall within class A4 (drinking establishments) of the Order so permitted development rights allow change of use without the need to apply for planning permission is emphasised. So the guidance highlights the fact that it is open to the local planning authority to remove these permitted developments through the use of an Article 4 direction.

The guidance also reinforces the potential of adding a building to a borough's list of Assets of Community Value indicating that once that step is taken permitted development rights do not for a period of five years. Asset of Community Value (ACV) designation gives voluntary and community groups and organisations the opportunity to bid for local buildings and public spaces if they are put up for sale.

IHBC welcomes the fact that the guidance reinforces the potential for boroughs to protect and enhance the cultural identity and activities, which can have heritage significance in a particular locality. IHBC welcomes that the document promotes the Agents of Change principle that the person or business responsible for the change is responsible for managing the impact of the change which is helpful in that it makes a developer consider the impact of a project on a locality as an integral part of the planning of the entire concept.

IHBC also welcomes the guidance which favours identification, management and co-ordination of clusters of evening and night-time entertainment and it welcomes the rounded concern which reinforces the value of addressing needs, including provision of public transportation, adequate policing, environmental services and minimising of impact on other uses.

Yours sincerely

A handwritten signature in black ink, appearing to read 'FN', is positioned above the typed name of the sender.

Fiona Newton,
IHBC Operations Director