



## INSTITUTE OF HISTORIC BUILDING CONSERVATION

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21 February 2005

Dear Madam

### **Changes to the Development Control System – ODPM Consultation Paper**

I refer to the above consultation document.

The Institute of Historic Building Conservation is the professional body for the United Kingdom representing conservation specialists and 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 IHBC broadly welcomes the general thrust of the proposed reforms to the Development Control system and agrees that the planning and consent regimes should be coordinated and made as efficient as possible.

Consequently the Institute supports the proposal to control repeat applications but considers that the opportunity to exercise similar control over twin-tracking, with its attendant aggressive impact on negotiations and burden on an already stretched appeal system, should have been taken.

Equally, support is given to the proposed duty to respond to consultations, Regional Planning Bodies as statutory consultees and the Economic Impact Reports as mechanisms to make the system speedier and more effective in supporting both the community and the development world.

Clearly, the duration of permissions and consents must be the same and the strong arguments in favour of reducing this to three years are recognised. However, many projects involving listed buildings and conservation area consents take longer than this to reach commencement stage. In those circumstances the consent would need renewal, involving further work for both the applicant

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and the conservation officers within the LPA. This would stretch yet further already hard pressed Conservation and Design Officers within Local Planning Authorities.

The IHBC remains concerned at the often inadequate provision of conservation experts within Local Planning Authorities as revealed in the joint report commissioned with English Heritage entitled 'Local Authority Conservation Provision in England'. These concerns were underlined in Recommendations 8 and 9 of the ODPM Housing, Planning, Local Government and the Regions Committee Report on the Role of Historic Buildings in Urban Regeneration'. It is clear from the experience of the IHBC membership that Planning Delivery Grant monies are not being used to address the current conservation staff and skills shortages, but are being directed at resourcing the quantified BVPI targets within Development Control and Policy planning service areas. As you will be aware, concern is now being expressed from many quarters about the impact this is having on the quality of design outcomes, the proper stewardship of the heritage and the missed opportunities for community based regeneration. It is the Conservation and Design Teams within Local Planning Authorities that are best placed to address these critical matters. Yet, in a non fee earning area of the Planning Service, they are too often perceived by chief officers as a burden on the budget and are, therefore, those who are most under-resourced and, in extremis, vulnerable to cuts. The ultimate burden of this loss is borne by developers and the community as opportunities to enhance the built environment, renew run-down areas and revitalise the local economy go unrealised.

Consequently, the IHBC invites the Government to carry out the research necessary to substantiate this resourcing shortfall, quantify the scale and scope of the problem and to steer PDG awards towards a targeted solution. The ODPM has already consulted on proposed heritage based BVPI targets, some of which have been successfully piloted. It is anticipated that this approach may ease the current situation and build in capacity that will enable the successful delivery of the proposed shorter duration for consents and permissions.

Please do not hesitate to contact me if you wish to discuss these comments further.

Yours faithfully



Dave Chetwyn  
Vice Chair