



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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Dear Mr Tamimu

HOUSING AND PLANNING DELIVERY GRANT

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 Department's objectives that HPDG should strengthen the delivery of increased housing numbers and promote efficient and effective planning.

However, the Institute has one serious concern and one specific aspect on which we would urge progress.

Q8. *Do you agree with our proposed criteria for the housing element?*

The Institute is concerned about the way in which this element of the Grant is proposed to be allocated. It seems to us that it will favour authorities in areas of major housing growth disproportionately at the expense of well-performing authorities in areas of lower growth. It will, particularly, be more difficult for authorities which are Housing Market Renewal authorities where demolition rates would make targets for net completions particularly hard to achieve.

Q9. *In principle, do you think Housing and Planning Delivery Grant should be used to support improvements in design quality?*

The Institute strongly supports HPDG being used to incentivise better design, in line with Government policy. Many of our members are actively involved in securing better design in all areas of new build and not simply in sensitive locations. We believe that better design should be available and achievable everywhere. Development of sites in heritage locations such as in conservation areas and affecting the setting of listed

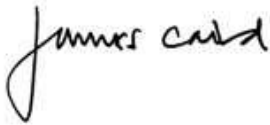
buildings where design quality is already high should be seen as a more viable contribution to the future supply of housing. The emphasis in design quality should relate to new design in all contexts and sizes of development and not simply to large scale housing development.

Q10. *Do you have any views on how the in the process could work in practice?*

It is quite clear that improvements to quality are difficult to quantify. Any design component of HPDG must be subject to external audit (perhaps by CABE). To make the process more workable it might be appropriate to require this element to be claimed by the authority through a self-assessment that is subsequently assessed independently at the expense of the authority. This would avoid the assessment of authorities that had little or no chance of success on this element.

The Institute would be grateful if these points could be taken into account.

Yours sincerely

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