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**Dear Sir**

**IHBC Consultation on Housing White Paper; Fixing our Broken Housing Market**

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 consultation document.

The Institute's comments are as follows:

**Making land ownership and interests more transparent**  
(1.17 – 1.21)

**IHBC Comment:** This could be a positive factor for heritage if greater access to this data means local authorities can easily identify the owners of heritage assets which have fallen into disrepair and take enforcement action.

The current initiative by the Land Registry to require Local Authorities to map all Listed Building curtilage to enable hand over of land charges is impossible and likely to cause serious legal complications. If this is the sort of dataset to be made available

then consideration needs to be given to the practicality of producing them and the ultimate value of them.

### **Boosting local authority capacity and capability to deliver**

(2.13-2.16)

**IHBC Comment:** Planning capacity and the scrutiny of planning applications by an informed conservation service is vital to properly protect England's heritage. Local authorities need to be provided with funds to ensure conservation services are adequate or required to use extra funding such as this for conservation service provision. The IHBC monitors the provision of conservation staffing in England and since 2006 has noted a decline of 36%<sup>1</sup>. With such a sharp decline in advice on the historic buildings and with limited specialist input available to the planning system. The planning system does not have access to skilled heritage professionals and ensuring it does have in the future should be a priority.

### **Construction Skills**

(2.25)

**IHBC Comment:** The Government proposals to take action to address construction skills shortages and change the way the Government supports training in the construction industry are a potentially welcome proposal. As well as general construction skills the IHBC hopes that heritage skills to enable the conservation, reuse and adaptation of historic buildings will also be a priority under this aim

### **Empty Homes**

(4.41-4.44)

**IHBC Comment:** The Government intention to support local authorities to encourage efficient use of our existing stock, making best use of homes that are long-term empty is a welcome recognition of an important issue. Many older properties and historic buildings at risk can stand empty and could provide an important contribution to the housing stock

### **Box 2: Proposed text of the presumption in favour of sustainable development**

#### **Heritage assets**

**IHBC Comment:** The changes proposed to the NPPF to clarify which national policies provide a strong reason to restrict development when preparing plans or which indicate that development should be restricted when making decisions on planning applications should aid clarity. Under the proposal the

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<sup>1</sup> <https://content.historicengland.org.uk/images-books/publications/eighth-report-la-staff-resources/eighth-report-la-staff-resources.pdf/>

listing to provide a clearer position is welcomed, especially the introduction of a definitive list rather than citing them as examples.

### **Green Belt land**

(1.37-1.4)

**IHBC Comment:** The reaffirmation that Government will maintain 'existing strong protections for the Green Belt' with 'Green Belt boundaries amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements' is to welcomed.

### **Accelerated construction**

(3.12)

**IHBC Comment:** The Government will 'work harder' to make public land available and ready to build on. It will also work with local authorities to help them bring forward their own sites. IHBC would like to ensure that the significance of heritage assets is properly considered in this disposal process and emphasise that 'best value' needs to be set within a context of what is best for communities and historic assets rather than a purely monetary concern. The disposal of publically owned land has been identified as a priority by many across the heritage sector.

### **Question 15**

**What are your views on the potential for delivering additional homes through more intensive use of existing public sector sites, or in urban locations more generally, and how this can best be supported through planning (using tools such as policy, local development orders, and permitted development rights)?**

**IHBC Comment:** Heritage assets may be involved and careful thought should be given to how this policy can be achieved. Appropriate consideration of heritage concerns at an early stage will be crucial in any plans to speed up planning processes. Working positively with heritage assets on the site from the beginning rather than working against them will ensure that the final outcome has context and continuity.

### **Question 23**

**We would welcome views on whether an applicant's track record of delivering previous, similar housing schemes should be taken into account by local authorities when determining planning applications for housing development.**

**IHBC Comment:** The Government is interested in views on

whether an applicant's 'track record of delivering previous, similar, housing schemes should be taken into account by local authorities when determining planning applications for housing development'. The Government would only intend for this proposal to be 'used in considering applications for large scale sites, where the applicant is a major developer'. Track record makes especial sense when considering the development of heritage assets, which require important additional creativity and knowledge of traditional buildings.

### **Question 25**

**What are your views on whether local authorities should be encouraged to shorten the timescales for developers to implement a permission for housing development from three years to two years, except where a shorter timescale could hinder the viability or deliverability of a scheme? We would particularly welcome views on what such a change would mean for SME developers.**

**IHBC Comment:** These changes could have a positive effect with some heritage assets which have been granted permission but where no work is carried out and the building continues to deteriorate. In other cases the assembly of funding packages especially for community projects can take a substantial amount of time and the project delivery could be jeopardised by a shorter timescale.

Yours sincerely



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IHBC Operations Director