



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Information Requirements
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Dear Sirs

STREAMLINING INFORMATION REQUIREMENTS FOR PLANNING APPLICATIONS

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.

Thank you for inviting us to participate in this consultation.

We have found this consultation difficult to respond to because so many of the issues are connected with Regulations and Guidance on Environmental Assessment, Design and Access Statements, pre-application discussions and other matters. We wish to see full consistency with other extant advice.

We are particularly concerned that the information required to be submitted with planning applications is:

- proportionate; but allows for detailed drawings and other technical detail where the sensitivity of the proposal or site demands it.
- informed; that is validated as meeting the requirements by somebody qualified to make the necessary judgement.

We see the proposals as helping these objectives and, subject to our comments set out below, would urge all LPAs to produce new local lists of requirements, detailing the precise circumstances applicable to each requirement, as soon as possible.

1. Do you agree with the proposed policy principles? If not, what amendments to these principles do you suggest?

Yes, broadly, but we think the policy should expressly say that detailed drawings and other information may be required where the sensitivity of the application or site demands it (for example, joinery details in cases involving listed buildings).

2. Do you consider that revising local lists in this manner will encourage a more proportionate approach to information requests by LPAs?

Yes.

3. Do you consider that implementation by December 2010 is a realistic timescale? If not, what would be more appropriate?

Yes. But LPAs should be urged to implement the proposals as soon as possible.

4. Do you agree that requirements for particular map scales, block plans, floor plans, site sections, floor and site levels, and roof plans should be set out by the local planning authority using a proportionate approach?

Yes, but these should also allow more detail than suggested in the question where merited (see our response to question 1).

5. Do you agree with the proposal to summarise major applications?

Yes.

6. Should the proposals for a summary document apply only to applications defined as 'major development'? If not, for what types of schemes might a summary document be useful?

It is not clear why this should apply to major applications alone. Other applications can also be subject to information overload. The Institute would favour a principle akin to the requirement for summaries of proofs of evidence at appeal Inquiries thus: if the submitted documents exceed 20 pages a summary of under 20 pages is required.

7. Do you agree that this approach is appropriate? Are there any other measures, apart from the consideration of validation as part of wider performance measurement, that should be taken to ensure improved local lists are developed and used?

Yes.

Bringing the changes together

8. Do you consider that the proposals described in Section 3 of this consultation paper will effectively support a more proportionate approach to information requirements and validation? If not, what would you propose instead/as well?

Yes.

9. Do you agree with the changes to DAS proposed in Section 4 and Appendix 2?

No. See our response to question 10.

10. Do you agree with the range of application types and designated areas that would be exempted?

We consider the proposal to remove the requirement in AONBs and National Parks inappropriate because of the sensitivity of these areas. We think the reduction in the requirements for the content of applications provides the appropriate balance for these areas.

11. Do you agree that the issue of context should be discussed in relation to the scheme as a whole (rather than specifically related to the sub-headings of amount, layout, scale, landscaping or appearance)?

The Institute thinks that the current guidance for Design and Access Statements provides a useful approach for many schemes as it focuses on the issues likely to be axial in the making of the decision and, particularly, as the DAS can be the applicant's protection from arbitrary planning outcomes in design terms. We think the applicant should be allowed to decide the approach to be taken for minor developments.

12. Are there other exemptions/changes that we should also consider? Draft guidance (Appendix 3)

No.

13. Do you have any comments on the draft guidance? Impact assessment (Appendix 4)

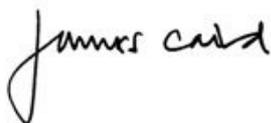
No.

14. Do you have any comments on the impact assessment, in particular on the assumptions made and the anticipated impact on small businesses?

No.

The Institute hopes these comments are helpful.

Yours faithfully



James Caird
Consultant Consultations Co-ordinator