



## INSTITUTE OF HISTORIC BUILDING CONSERVATION

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Dear Mr Smith

### LISTED BUILDINGS CASEWORK CONSULTATION

I refer to the above consultation document.

The Institute of Historic Building Conservation (IHBC) is the professional body for 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 respond to the consultation on Listed Buildings Casework and supports the overall objective of the consultation to simplify the process by which listed building consent applications and appeals are determined.

As more than 90% of all buildings are listed at Grade II the proposed changes to listed building consent applications, appeals and enforcement appeals as detailed in the consultation are unlikely to have a significant impact on local planning authorities. However, the proposals may assist in reducing the time taken to reach a decision on appeals relating to Grade I and Grade II\* properties and make potential administrative savings.

The Planning Inspectorate should be able to fulfil the proposed role and decide appeals involving Grade I and Grade II\* listed buildings. However, the Institute is concerned that there is a lack of Inspectors with specialist listed building knowledge to deal with often highly sensitive and complex issues involving the historic built environment. Staff with appropriate conservation expertise would need to be employed to advise the Inspectors when dealing with listed building consent and enforcement appeals involving heritage and/or design issues.

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There is unlikely to be a significant reduction in the time taken on listed building consent applications to the current referral arrangements involving the notification of English Heritage.

The Institute would suggest that the meaning of 'no objection by English Heritage' be considered further as the standard English Heritage response often refers to 'not intervening' or 'not intervening but offering the following observations'. Would this response be considered as 'no objection by English Heritage' in terms of the draft circular or would English Heritage need to redraft its correspondence?

I trust these comments are helpful.

Yours faithfully

Karen Holyoake  
Consultations Secretary