



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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Dear Madam

PPS 4: PLANNING FOR SUSTAINABLE ECONOMIC DEVELOPMENT

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. We were pleased to see the references to heritage and historic assets both as potential contributors to economic development and to environmental sensitivity that might, in some circumstances, indicate restraint.

The Institute's comments on the questions set out in Part 4 are as follows:

1. Do the policies set out in draft Planning Policy Statement on Economic Development achieve the right balance between economic, social and environmental considerations? Will they help to deliver sustainable development?

The Institute supports the broad thrust of the PPS in the balance between economic, social and environmental considerations. These are seen by many as being in outright competition with one another. The Institute believes that the planning system is capable of delivering balance in which all three considerations can be optimized. If the draft PPS has a weakness in promoting sustainable development, it may be that it does not express strongly enough the importance of spatial planning. Many business developments create significant travel and transport demand, and these can have serious cumulative effects.

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The Institute has some specific comments on the text:

Paragraph 11 rightly points out the need to tackle climate change. The Institute thinks that an additional paragraph here on other important environmental objectives would be useful. This could refer to the place making, design, heritage and biodiversity policy objectives.

The list of sectoral contributors to economic development in paragraph 13 is long enough to seem comprehensive, yet does not include heritage. We think heritage should be included. While heritage developments are often allied with tourism, this is not always the case. Heritage can be used to stimulate economies as a starting point for mixed use developments.

The Institute strongly supports the statement about contribution historic buildings can make to economic development in the headline paragraph before paragraph 25 and in the fourth bullet point of paragraph 25 itself. The sixth bullet point refers to a number of criteria for assessing the suitability of tall buildings but not heritage. We think heritage should be included here.

The Institute supports the reference to historic environment in the headline paragraph before paragraph 26 but feel that this should be followed through with specific requirements in paragraph 27.

The Institute strongly supports the process of early discussions in paragraph 31. It is particularly true in relation to historic buildings that early discussions can be of benefit to development proposals. As this is an area of expertise which is unfamiliar to many developers, perhaps historic buildings could be given as an example in the last line of the paragraph?

2. The draft Planning Policy Statement proposes a stronger emphasis on the need for evidence, including economic evidence for plan making and decision making. Do you agree that this is the correct approach?

The Institute strongly supports the emphasis on the need for evidence as set out in paragraphs 9, 18-22 and 29.

We would like to see heritage included in the definition of "high quality environment" in the second bullet point of paragraph 18.

3. If you agree that there should be a stronger emphasis on the need for evidence what are your views on the following [not listed]:

The Institute supports the need for a list of the type at Annex A to be included in PPS4. We feel that this is a useful checklist not just for the benefit of Local Planning Authorities, but also to ensure that the full range of issues that Local Planning Authorities are expected take into account in plans and decisions is in front of developers, economic development agencies and others who will be involved with economic development programmes and projects.

Under the headings of Land and Property Data and Survey Data, reference should be made to information on the availability of historic buildings and land in heritage locations which might suit specific business types.

The Institute supports unification of data sets for ease of use by the development industry and planning applicants. If there is to be a mandatory economic assessment, data sets compiled under PPS4 should form part of the assessment.

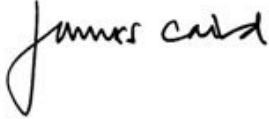
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The Institute favours data being collected at the finest practicable scale. This should usually be at parish/ward level. Data so collected can easily be aggregated to form subregional and regional data sets, but disaggregation will always be more difficult.

The Institute has no comment on questions 4-10.

We should be grateful if these comments could be taken into account.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large initial 'J'.

James Caird
Consultant Consultations Co-ordinator