



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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Dear Mr Canovan

PROPOSED CHANGES TO PPS6

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 main issue for the Institute is the integrity of our historic town centres and the historic buildings they contain. We have supported the current PPS policy because we feel that the oversupply of retail space for major multiples can lead to marginalisation of smaller retailers on price and thus weaken the offer in traditional town centres. This in turn weakens attractiveness to consumers, undermines trading in town centres and investment in retail and other town centre property.

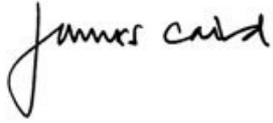
The Institute accepts that this is now seen as having unforeseen consequences and that a policy largely based on the need for floor space is seen as crowding out new entrants in an area and thus supporting local monopolies. We think this may have much wider implications of anti-competitiveness than impacts on smaller traders particularly considering the rapidly increasing impact of internet trading.

So the Institute supports the removal of the requirement to show need so long as this is replaced, as proposed, with a reinforced the requirement to assess impacts by giving as much weight to qualitative aspects as quantitative ones. We also support the extension of the scope of the Guidance to the wider range of competing centres which should be assessed for impact.

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We would hope that the changes will not have any worsening effects on existing centres. We know that the markets for independent traders and small scale multiples are evolving with increasing specialisation, co-operation and internet trading. However, we feel that their resilience to large-scale competition will vary from place to place and that a proper qualitative assessment on the impacts of the town centre as a whole will continue to be required where large scale proposals are made.

Yours sincerely

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

James Caird
Consultant Consultations Co-ordinator