



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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Dear Mr Neal

PLANNING AND TRAVELLERS

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.

The Institute welcomes the proposed changes in general but, while we have no specific comments in relation to sections 2 and 4 of the Consultation, we have do a comment on section 3 and your **Question 4**.

We think that the revised policy should also reflect the NPPF's protection for heritage assets. The Consultation recognises the protection given by the NPPF to sensitive sites by virtue of paragraph 115, but not seemingly to the similar protection afforded by paragraph 132 to heritage assets, even though the term "great weight" is used in both.

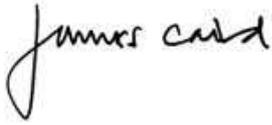
Councils are obliged by the TCP(LB&CA)Act 1990 (ss66 and 72) to have regard to heritage assets in the decisions that they make. We think this requirement should be reflected in the new guidance. One frequently used sobriquet is "article 1(5) land" which also includes National Parks and AONBs, but any other formula that achieves the same end would be fine, and the setting of listed buildings is an important requirement of the provisions mentioned.

Continued/...

The list of heritage assets that should be covered includes World Heritage Sites, Scheduled Monuments, listed buildings, conservation areas, historic battlefields, parks and gardens, all of which have a formal designation process.

We hope these comments are helpful.

Yours faithfully

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

James Caird
Consultant Consultations Co-ordinator