



INSTITUTE OF HISTORIC BUILDING CONSERVATION

Planning-gain Supplement Consultation
Room 2-32
HM Treasury
1 Horse Guards Road
London
SW1A 2HQ

Mrs Karen Holyoake
PGDipTP, PGDipArch, BA(Hons)Arch, IHBC
Consultations Secretary
Institute of Historic Building Conservation
Handel House
64 Campbell Street
Brierley Hill
West Midlands
DY5 3YD

Tel: 01902 555625
Mob: 07956 538398
E-mail: consultations@ihbc.org.uk

27 February 2006

Dear Sir

Planning-gain Supplement (PGS): 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.

In response to the Planning-gain Supplement (PGS) consultation document the Institute would like to highlight the following issues which need further consideration.

The Institute is concerned that the proposed scaling back of Section 106 Agreements, to matters relating to the environment of the development site and to the provision of affordable housing, detracts from the fundamental nature of Section 106 Agreements. The current planning obligation system can be used to enhance the quality of major developments, agree community benefits with developers and make the proposals acceptable in land-use planning terms. However, if developments can not be made acceptable through Section 106 Agreements, it could mean that more schemes get refused, which is a real concern. The consultation provides no detail about how the tax levied will be redistributed, how much will actually benefit the local community, and what constraints there may be. The worry is that the historic environment will suffer as a result of the proposed changes to Section 106 Agreements.

INSTITUTE OF HISTORIC BUILDING CONSERVATION

The PGS proposes to exclude the smallest commercial developments and household improvements. The Institute believes that this may discourage works to the historic environment and urban regeneration activities, which is contrary to the Governments aims of creating sustainable communities and improving the built fabric of our towns and cities.

The consultation considers the use of the PGS levy to allow the wider community to share more broadly in the development gains, including funding for local and strategic infrastructure necessary to support and stimulate new development and contribute to long term sustainability. However, there is concern that the scope of the PGS essentially undermines the work to historic places and buildings, and the Institute would like to emphasise the need for this to be taken into account. In addition, clarity on how the PGS impacts on a 'change of use', an important aspect in heritage-led regeneration, is needed.

I trust these comments are helpful.

Yours faithfully

Karen Holyoake
Consultations Secretary