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BUILDING · CONSERVATION

Making Heritage Work

Red Tape Challenge
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Dear Sirs

RED TAPE CHALLENGE: PLANNING ADMINISTRATION

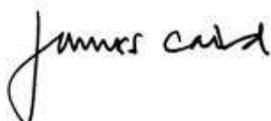
The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support 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. We wish to comment on the Red Tape Challenge generally but have no specific proposals to make other than a general one about the way in which Regulations under the Planning Acts are issued and removing the requirement for publicity in printed newspapers at our final two bullet points below.

- The Institute supports the simplification of Regulations generally so long as matters being regulated are not materially affected without proper consideration.
- Many of the Regulations to which the Challenge relates concern aspects of the historic environment (HE). Some of these are HE specific and others are embedded in the planning system as a whole.
- We would wish to emphasize the importance of the historic environment in the economic and cultural life of the nation. Nothing should be done to affect the regulation of this without considerable care and forethought. As a general principle, therefore, the Institute considers that the current Regulations are about right in addressing the balance between HE and other interests in the regulation of new development.
- Nevertheless, if specific proposals are made under the Red Tape Challenge which the Government thinks are merited, we should be happy to consider them in a further consultation.

- One aspect on which we would urge the Government to give attention is the difficulty that users of the planning system have in accessing the current text of any particular Regulation. The custom has always been to make changes to regulations through "Amendment Regulations" and the large number of these that now apply in planning system is notable in the lists of regulations under review. Thus, unless users have access to Sweet and Maxwell's Encyclopaedia, they have to look in several places to see the full current text of any particular Regulation. This is troublesome, time-consuming and error-prone. Any amendments as a result of the Red Tape Challenge would, presumably, be dealt with in this way, in fact adding to rather than reducing the list. The Institute thinks the Government should consider a change of policy in which amendments to Regulations are issued as revised substantive texts with an explanatory list of what amendments are being or have been made. This would reduce the apparent amount of Red Tape at a stroke and be of considerable benefit to users.
- Another aspect the Government may like to consider is the high cost to Local Planning Authorities of newspaper advertising of planning and listed building applications, notifications of new designations and other proposals. We note that in other areas of regulatory reform the removal of such requirements in favour of electronic publicity methods alone is being considered and introduced; and now might be the time to apply the same thinking to the Planning legislation.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive, slightly slanted style.

James Caird
Consultant Consultations Co-ordinator