



INSTITUTE OF HISTORIC BUILDING CONSERVATION

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Dear Madam

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Regional Aid 2007-2013 Initial Comments

I refer to the above consultation document and invitation for early responses by 28 June 2004.

The Institute of Historic Building Conservation is the professional body representing conservation specialists and practitioners in the public and private sectors in the United Kingdom and the Republic of Ireland. It has around fourteen hundred members divided between fourteen branches. 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 IHBC is extremely concerned at the potential loss of 'Tier 2' status from the North East, Central Scotland, Midlands, North West and Yorkshire areas of Britain. The loss of Tier 2 status will undermine efforts to regenerate town and city centres and areas suffering from market failure.

The Institute recognises the efforts that the Government has made since 1999 to address the Commission's disastrous ruling on gap funding, especially through the notifications relating to heritage regeneration, housing, land remediation, and other matters. It is essential that such provisions continue beyond 2006 to facilitate regeneration including heritage-led initiatives, the development of 'city living', cultural development, and a range of other legitimate activities. Further advances need to be made to allow funding for the improvement of buildings that are not statutorily protected, encouragement of more sustainable forms of development and building practices, townscape enhancement, etc. In addition, the *de minimis* threshold needs to be reviewed and raised by the Commission.

It is essential to remove the competitive disadvantage resulting from incompatibility between State Aid rules and UK development and regeneration processes, which often rely on partnerships and private sector initiatives.

I trust that these comments are helpful.

Yours faithfully

INSTITUTE OF HISTORIC BUILDING CONSERVATION

Dave Chetwyn
Vice Chair