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Date: 05 October 2010
Our Ref: IHBC/05/10/RC
Your Ref:



Resourcing Planning
Directorate for the Built Environment
Scottish Government
2J (South) Victoria Quay
Edinburgh
EH6 6QQ

Richard Cartwright
IHBC Scotland
Consultations Secretary
c/o NLC Environmental Services
Fleming House,
Cumbernauld G67 1JW
www.ihbc.org.uk

Dear Sir/ Madam,

CONSULTATION ON RESOURCING A HIGH QUALITY PLANNING SYSTEM

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 Scottish Branch of the Institute welcomes the opportunity to comment on this consultation paper and has the following comments to make on the document. These comments are restricted to aspects of the consultation related to the assessment of applications (or pre-application enquiries) concerned with the built heritage.

Responses to Consultation Questions

EFFECTIVE USE OF RESOURCES

Quality

Q1. What measures could be implemented that would improve the quality of application and supporting information?

Any application affecting a Listed Building, Conservation Area or World Heritage Site should be required to contain a Conservation Statement which addresses in detail all impacts on any such designated heritage asset.

Pre-application Discussions

Q2. Would you be in favour of the introduction of a charge for pre application discussions? YES
In considering your response, should this be a one-off payment or should it be discounted against the subsequent submission of a planning application? (NO to discounting)

Contd/

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REVIEW OF THE FEE STRUCTURE

Allocation of the fee

Q7. Do you consider that other consultees should charge the relevant planning authority for their input on planning applications? NO. If responding comes within a statutory duty of the consultee then they must do so (& no fee is warranted); if a response is in the interests of the consultee in order to perform their roles & targets then they should set a budget for this.

Environmental Impact Assessments

Q13. Do you consider that submission of an EIA should warrant an additional fee?

If so what might an appropriate charge be? YES, as more work is clearly required due to the specialist matters involved (which may include those relating to the historic environment).

Fees for application for planning permission in principle

Q14. Do you agree that applications for planning permission in principle should continue to be charged at half the standard fee? YES (although no application in principle should be allowed to be made where a listed building is affected).

Discharge of Conditions

Q16. Do you think there should be a fee payable for discharge of conditions? If so, should this be refundable where a decision has not been made within a set period of time? YES, as there can be significant extra work involved here, including on matters related to the historic environment.

Planning agreements

Q17. Do you think there should be a fee payable on the conclusion of a planning agreement? If so, how should this be calculated? YES, as again there can be significant extra work involved.

Any other comments

Q25. We welcome any other views and comments that you might have on Resourcing a High Quality Planning System that have not already been covered within this consultation.

The Scottish Branch of the Institute would be grateful if you could consider these points in the review to be undertaken in the light of consultation responses.

Yours sincerely,

Richard Cartwright
Scottish Consultations Secretary
Institute of Historic Building Conservation

RESPONDENT INFORMATION FORM:

Please Note that this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name	Institute of Historic Building Conservation
Title	Mr
Surname	Cartwright
Forename	Richard
1. Postal Address	Built Heritage & Design Team North Lanarkshire Council Fleming House Cumbernauld G67 1JW
Phone	01236 616537
Email	CartwrightR@northlan.gov.uk

3. Permissions

I am responding as...**Organisation**

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?**Yes**

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis **Yes, make my response, name and address all available**

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).Are you content for your **response** to be made available? **Yes**

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise? **Yes**