



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

CLG Committee  
House of Commons  
London  
SW1A 0AA

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Dear Sirs

**COMMUNITIES AND LOCAL GOVERNMENT COMMITTEE INQUIRY ON PLANNING AND PRODUCTIVITY**

The Institute of Historic Building Conservation (IHBC) is the professional body for building conservation practitioners and historic environment experts working in England, Northern Ireland, Scotland and Wales, with connections to the Republic of Ireland. The Institute exists to establish, develop and maintain 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 have seen the Committee's letter to Brandon Lewis the Minister of State and would like to add our questions and comments as additions to it.

A. Local Plans

1. How would requirements for specialist expertise be handled? We are specifically thinking of the need for properly qualified and experienced advice on heritage matters but the same requirements exist for the natural environment and for other specialist planning issues including EIA.
2. A alternative idea, in our view, which would also partly answer criticism of the proposal for automatic planning permission (issue C) would be for the presumption in favour of planning permission on partially completed local plans to be strengthened. This would ensure that proposed development sites had been screened in an environmental assessment. Even without testing of this in a local inquiry the result would be preferable to the proposal.

## B. Density and land allocation

3. There is already considerable development pressure for higher density housing arising from land values, not least at transport hubs. We support this in places where such development contributes to the sense of place and where the strategic contribution of the transport hub justifies it.
4. Where higher densities are resisted by LPAs there are often environmental requirements such as townscape value and the setting of listed buildings driving the argument. The IHBC would not wish to see this aspect overrule the proper consideration of matters of local context and community value.

## C. Automatic planning permission

5. The IHBC objects to this proposal. We do not think, from the way in which it is described, that it is acceptable. The process required for deciding what land might be included on the Register sounds as though (as it should) a very similar process to the Local Plan process. Dealing with some brownfield land in a completely separate process to the Local Plan process makes no sense. The letter to the Minister does not mention the historic environment, which we would wish to see added to the list of questions, and only covers townscape to the extent of "design quality". We would be relatively content if the proposal consisted merely of a ministerial direction that outline planning permission must be granted in such circumstances with all matters reserved and a list of specific matters which might also be covered by condition: archaeology, wildlife, etc.

## D. Compulsory purchase

6. We have no objection to the proposals but we think the Government should be urged to promote the compulsory purchase of land-banked land whatever the ownership may be, including that held by developers, where this has remained undeveloped for too long. We also think the Government might encourage inter-developer land transactions where developers hold land for which their part of the market is not ready.

## E. Housing as a Nationally Significant Infrastructure Project

7. We would ask that the process continues to have historic environment safeguards and processes.

## F. Performance regime

8. We have very serious concerns about this proposal. There is considerable emerging evidence that the scarcity of resources in LPAs, which were run down during the recession and are currently not being replaced, is already giving rise to a poorer quality of decision-making as well as slower response times. Future generations will not thank us for this.
9. Bearing in mind that the need for the Government's hand-to-mouth handling of so many issues facing the country have been caused by lack of planning, we think that adequate resourcing of planning the built environment (which is the vehicle and accommodation for most of the economy) would be an absolute priority.

## G. Certificate of Lawful Development

10. We have no objection to this subject to a requirement that any requirement for listed building consent is pointed out in the decision notice.

#### H. Zero carbon housing

11. The IHBC finds the Government's position on this mystifying leaving aside the apparent abandonment of international commitments on carbon emissions. Adopting standards that reduce the cost of home occupancy should include running costs as well as capital costs and rentals. The drive to make more affordable housing available should include the reduction of heating costs, particularly as retrospective improvements of performance (as has been exposed by the Green Deal) are considerably more costly and raise many technical issues. Rather than disposing of this as a "cost" to developers, the Government should start a campaign to make zero-carbon homes and their cost advantage a matter of industry competition.

#### I. Upward extensions in London

12. The principal planning problem for today is that of housing affordable. Making it easier for houses to be made more expensive should not be a priority.
13. There must be exceptions for listed buildings and conservation areas. In such circumstances proposals should require permission in the usual way.
14. There is nothing like uncontrolled development to devalue other property in the neighbourhood. We would expect the Government to know this. People proposing to extend their property often misjudge the potential to reduce, rather than enhance, the value of their property by the harming of the property's character and appearance. It should not be left to neighbour objections to be the sole arbiter of or yardstick for what is acceptable. Leaving aside the definition of neighbour (and its potential for divisiveness), defining what constitutes an objection might be problematic.

#### J. Enterprise zones

15. We have no comment on this.

#### K. Surplus public sector land

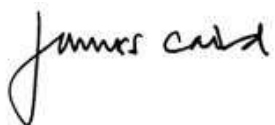
16. We support the proposals where the land is in suitable locations. It is important that such sites are subject to proper scrutiny in terms of travel demand, ecology, historic environment and landscape value.
17. Perhaps the required incentives could be achieved through Departmental/Authority budgets being deemed to be making a return on their capital value?

#### L. General

18. There is already widespread public concern that planning is something that is done to local communities rather than by them. As a whole the proposals take planning even further from the communities that it is supposed to serve. This seriously undermines the Government's own localism agenda. We regret this and would prefer interventions to be in the form of creating incentives and penalties for local authorities that fail to perform adequately rather than the nationalization of the process.
19. In many of the proposals there is doubt about whether the supposed burden on developers is one of speed of LPA decision-making, the narrow interpretation of policy by LPAs or a development industry that cannot be bothered with delivering quality development. The IHBC asks the Committee to try to get to the bottom of the criticism in each case before concluding on the merits of the remedy.

We hope these points 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 initial 'J'.

James Caird  
Consultant Consultations Co-ordinator