



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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Dear Madam

PLANNING FOR SCHOOLS DEVELOPMENT

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.

The Institute strongly favours Option 1 because, in our opinion, the Consultation Paper greatly underestimates the disbenefits of the major relaxations proposed. Many of these are discussed in the paper but several of them have the possibility of occurrence or intensification after (or even long after) the initial decision to establish the school has been taken.

The proposal has too much potential for unforeseen consequences to be acceptable. It fails to consider the implications for the Historic Environment (or other environmental impacts, for that matter) despite many of the existing uses included in the prospective list occur in town centres where HE sensitivity might be expected. It makes no concession to the possibly (one might hope likelihood) that schools may be successful and quickly outgrow their ability to avoid impacts. Potential impacts include:

- Overloading surrounding highways, including, often, residential streets.
- Noise and disturbance from traffic, play grounds, etc.
- Doubtful development sustainability – especially if the chosen location generates car journeys, rather than walking.
- Impact on the character of surrounding places.

It would be a great shame, in the Institute's view, if schools were allowed to be developed in locations that might be unsuitable in the long-term because of a lack of foresight that the planning process can bring to the development process.

It may be that the basis for the proposals is a fear that Local Authorities will use their planning powers to unreasonably frustrate proposals for new schools. This could be overcome with a strong policy presumption in their favour rather than permitted development rights on the scale proposed.

The Institute believes that many projects will require planning permission regardless of the proposals because works of operational development will be proposed. In addition, listed building or conservation area consent may also be required.

Above all, the proposals fly in the face of the Government's localism agenda by allowing developments that may be opposed by a majority of residents in a neighbourhood.

If the Government rejects Option 1, then the Institute prefers Option 2. In any event it needs to be made very clear in Guidance that the proposals do not remove the obligation to gain listed building consent, conservation area consent or planning permission for operational development if these are required.

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