



INSTITUTE OF HISTORIC BUILDING CONSERVATION

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Dear Sir

Planning Delivery Grant 2007/08: Proposed Allocations Criteria

I refer to the above consultation document.

The Institute of Historic Building Conservation (IHBC) is the professional body for 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 Institute welcomes the opportunity to respond to the consultation on Planning Delivery Grant (PDG) 2007/08: Proposed Allocations Criteria, and would make the following comments.

Handling Planning Applications

It would appear that the emphasis and amount of grant for Development Control is being placed on meeting and exceeding certain targets rather than improvement in performance. This has an obvious impact on the allocation of PDG.

LDF delivery and BVPI 219

The IHBC is concerned that the PDG allocation still does not recognise the importance of the efforts being made by many LPAs and their conservation staff to meet the requirements of BVPI 219 (Conservation Areas). Aside from their intrinsic value to the delivery of the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990, the documents that are the focus of the BVPI have a key role to play in the LDF process:-

The character appraisals demanded by 219 part b) will form key supporting evidence for LDF Core Strategy policies on historic areas.

Similarly, the Conservation Area Management Proposals required under part c) of the BVPI will inform and underpin many regeneration projects up and down the country and, of particular

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importance here, LDF DPD Area Action Plans. They will also form the cornerstone of many Heritage and Design SPDs.

Without these key supporting conservation documents many LDF policies and documents are likely to be found 'unsound' at examination causing considerable delay in the implementation of the LDF system. Much evidence has already been placed before the Government that demonstrates the chronic under-resourcing of conservation work and staffing levels within LPAs. The Institute is of the view that it is vital at this key stage of the LDF process that the Government gives proper support to the delivery of this BVPI. The PDG system can and should be used to incentivise enhanced performance in this area.

Whilst the Institute recognises that it is perhaps not appropriate to include Supplementary Planning Guidance (SPGs) in the assessment of performance, Statements of Community Involvement (SCIs) should be included and PDG awarded for meeting milestones in their preparation. SCIs have been key documents upon which LAs have focused resources and sought to deliver against LDF milestones. Consideration should therefore be given to recognising and rewarding this performance.

Regarding Development Plan Documents (DPDs) it would seem that the proposals would reward those local authorities that concentrate their resources on few DPDs rather than those authorities that have been ambitious in the number of DPDs they are progressing and delivering. This is where the proposals should take into account workload and those authorities that are trying to secure extensive and up to date plan coverage.

Environment

Consideration of the environmental impact of development is, rightly, a key consideration in the apportioning of the PDG. Furthermore, the control of carbon emissions is now regarded as the fundamental measure for managing global warming within the sustainable development priorities of the planning system. Considering the 'Proportion of energy used in new development which comes from on site renewables', as currently proposed, can only promote essential reductions in carbon emissions where the entire strategy for new development (including sourcing building materials) explicitly includes giving priority to the capacity for existing structures, historic and otherwise, as a resource capable of renewal through appropriate conservation strategies. This will have the triple benefit of maximising the potential of existing energy resources - represented by the embodied energy of on-site structures - minimising the land-fill consequent upon the removal of structures for dumping off-site, and help in the holistic management of carbon emissions attached to the development as a whole.

Housing Demand

The Institute is concerned about the proposed revision of the PDG focus and formula. It would appear that the proposal is to base the new grant on housing numbers. This ignores the fact that many areas have problems of over-supply. Such a proposal should therefore be more qualitative than quantitative and could benefit from a supplementary document on housing design. Even in those areas of the country where there is a perceived demand for new housing, the proposed new scheme, with the formula focussed on the building of new housing, ignores the reality that LPAs may only give permission for housing. There is nothing other than market demand to compel applicants to build. Indeed there is plenty of evidence of permissions being sought by applicants to build new houses for which there is no real intent to build – the applicant's purpose rests in enhancing the value of the land and thereby the company. Consequently, while the LPA may fulfil its role in giving permission for new homes, it can find, due to factors beyond its control, that few houses are actually built in its area and thereby it may not get its efforts recognised within the proposed new PDG regime. The Government needs to incentivise both parties – the LPA and the building industry – if it is to meet its housing objectives.

E-Planning

The Institute supports the commitment of the Department for Communities and Local Government (DCLG) to the developing e-planning agenda. A realistic approach is however needed. The proposed criteria and targets will be a challenge for many planning authorities. A more measured approach with targets being increased gradually over the next few years should be considered.

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The Institute would like to emphasise the need for PDG funding to enable digital spatial capture of listed buildings, conservation areas and other designations to support delivery of TLD (Land Charges), NLIS (National Land Information Service) and e-planning. The provision of these services is essential to deliver Customer Access Strategy, BV 157 and Freedom of Information Act targets and should be an important consideration in this consultation.

In summary, the Institute welcomes the PDG as recognition that planning functions must be properly resourced. The allocation of grant should perhaps be more closely linked to the workloads of the local authorities, the key role BVPI 219 will play in underpinning LDF 'soundness' and with reference to the historic environment the complexity of listed building consent applications and planning applications for works to properties in a conservation area. This consultation provides the opportunity to highlight that the historic environment is concerned with the quality of the delivery of a service and that such a service can not only be assessed quantitatively.

New grant should be based on employing specialist design and conservation skills, community engagement best practices, member training (in particular Development Control Committee member training) and maintaining quality services. The PDG could also include for buildings at risk surveys with clear timed action plans for at risk buildings. The Institute would like to suggest that a much wider and quality orientated scheme be introduced, including historic environment and design performance.

I trust these comments are helpful.

Yours faithfully

Dr Karen Holyoake
Consultations Secretary