

From: Simon Avery [mailto:savery@bell-cornwell-london.co.uk]
Sent: 10 December 2009 15:35
To: Planning Policy
Subject: RE: Core Strategy Consultation - Policy CH2 b).

Dear Madam,

Thank you for your comments below.

For clarity, to express my comments in terms of the specific "Soundness" tests wording:

1) justified - the application of those standards to all listed buildings is neither credible, nor is there a robust evidence-base to demonstrate that all listed buildings are capable of compliance with those requirements without falling foul of National Policy, as expressed in PPG15 (see below)

2) effective - the potential conflict with PPG15 renders Policy CH2 b) being vulnerable to not being deliverable. Omission of the "site character" proviso also makes the policy inflexible

3) consistent with national policy - PPG15 paragraph 3.4 requires alterations and extensions to listed buildings to be either needed or desirable **from a heritage perspective**, rather than from the perspective of other regulations. To require all residential proposals which include alterations/extensions to listed buildings to comply with those other standards is very likely in most cases to be inconsistent with PPG15 paragraph 3.4 requirements.

I trust that clarifies my comments in an appropriate form for Core Strategy purposes.

Yours faithfully,

Simon Avery BA(Hons) B.Phil Dip.Urban Design MRTPI
Partner



Bell Cornwell LLP
St Mary's Court
The Broadway
Amersham
Bucks
HP7 0UT

DD: 01494 618414
T: 01494 618444
F: 01494 582020

This email is sent for and on behalf of Bell Cornwell LLP. Bell Cornwell refers to Bell Cornwell LLP, a Limited Liability Partnership registered in England and Wales with registered number OC340551. The registered office is at Oakview House, Station Road, Hook, Hampshire, RG27 9TP. A list of members' names is available at the above address. We use the word 'partner' to refer to a member of the LLP or an employee or consultant with equivalent standing and qualifications.