



CONSERVATION
PLACES & PEOPLE



Planning for the Future **Planning White Paper** **Briefing Note**

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All-Party Parliamentary Group on CONSERVATION, PLACES & PEOPLE

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Local Plans and Neighbourhood Plans

1. The PWP proposes categories (zoning) for land through the Local Plan process (Growth, Renewal, Protection). Growth areas would grant outline planning permission, whilst renewal areas would grant permission in certain circumstances. This does simplify later stages of the planning process. On the other hand, it reduces the scope for communities and businesses to influence decisions on specific development proposals for specific sites.
2. Growth areas would create certainty and save cost for developers. However, the Local Plan process, which would now include granting of outline planning permission, would become more complex and with additional costs (currently covered by developers). A 30 month statutory period for preparing local plans is proposed. Faster plan preparation would be advantageous. But some have questioned how realistic this is, given the added layer of complexity.
3. The PWP shifts emphasis of local plans from policy making to formulation of rules and codes, based on centralised policies. Existing local plans do include a lot of repeated policies. However, they also include locally important policies. There is no point in repeating national policies, but there does need to be capacity for locally-specific issues to be addressed.
4. Neighbourhood plans are mentioned in a few places, but there appears to be a narrowing of their scope onto design codes. There is no recognition of the ways in which neighbourhood plans are delivering growth, for example in housing site allocations and policies for economic diversification and regeneration of the high street.
5. The PWP diminishes the role of neighbourhood plans by passing all decisions on growth to the local plan level, and by removing the need for planning applications in some instances (so that neighbourhood plan policies can't be applied). On the other hand, the Secretary of State has indicated a wish to raise the importance of neighbourhood planning and not diminish it, so this may indicate that thinking has moved on since the PWP was drafted.

Public Participation

6. The text on public participation is focused on use of digital media. Use of digital and social media is now an essential part of engagement and consultation. Greater consistency would be advantageous. However, some have pointed out that engagement and consultation activities need to be inclusive, including for people with limited or no access to IT.
7. Participation in design codes is a positive aspiration, but many have argued that this is not a substitute for opportunities to participate in specific development schemes.

Infrastructure

8. The paper recommends simplification of the current CIL and Section 106 provisions. Simplification is a useful aim. Consideration needs to be made of areas where viability is an issue, so there is little scope for raising monies.

Place and Historic Environments

9. The historic environment is mentioned briefly, but with no specific questions. It is not clear how the special statutory duties for listed buildings and conservation areas would be applied through the land categories (zoning) exercise. The suggestion that certain specialists could bypass consents for listed building works could undercut public accountability, though some in the heritage sector acknowledged the value of exploring

better consent processes.

10. Concerns have been expressed over skills and capacity in local authorities, including design and heritage skills (as demonstrated in the IHBC's 2020 research into 'Local Authority Conservation Staffing Resources in England...').
11. In the new land categories, Conservation Areas are classed as 'protect', yet these include economically active areas that are sometimes undergoing dramatic physical and economic transformations, including urban centres, high streets, industrial and commercial areas. The Renewal categorisation would not be appropriate for conservation areas, as it would lessen protection. There may be a need for an additional category to those suggested in the PWP for complex areas, where there needs to be a careful balance of protection and change. This could include conservation areas, but also perhaps commercial areas, residential areas, high streets and designated neighbourhood areas.
12. The emphasis on design has been welcomed. However, the term 'beauty' has been questioned by many for focusing on appearance and subjective matters, rather than more fundamental aspects of design, such as pedestrian permeability and connectivity, green infrastructure, green design and the public realm. Design is addressed primarily through design codes. Design codes are seen as a positive step by many. On the other hand, some have argued that placemaking and achievement of good design need to be inclusive, participatory and creative activities. The reliance on design codes and proposed 'fast track to beauty' appears to reduce the scope for meaningful participation for specific development proposals and specific sites.
13. It is proposed to create a central design body. This could be a positive step. Many have argued that such a body would focus on design fundamentals and addressing climate change, and not promote a particular aesthetic agenda.
14. Apart from a single reference to encourage energy efficiency measures in historic buildings, the PWP does not recognise the inherent sustainability of the historic buildings and places and how they can contribute to sustainable economic development, whilst mitigating and adapting to climate change.

Levelling up - what is missing from the PWP?

15. There have been repeated claims that planning policy and Government programmes assume a London-type land economy, where affordability is the key issue. A greater focus has been suggested on areas where viability is the issue, and where house-building will only be viable if economic opportunity is created. It has been suggested that this approach has created more land-inflation in high growth areas, whilst other areas with more capacity have stagnated. It should be noted that this is not only a north-south issue. There are parts of the south-east where viability is the challenge.
16. This requires careful consideration, especially if build-out rates are to be increased, without undermining house-builder business models. Also, standard models for assessing housing need have questioned, given the discrepancy in land economics in different parts of the country (the value of a two bedroom house varies from less than £50,000 in some areas to more than £1 million in others).