

## Local Plan Process Consultation Response

23 October 2015



The Heritage Alliance is the key coalition of heritage interests in England, bringing together over 100 mainly national organisations which are in turn supported by 6.3 million members, volunteers, trustees and staff. Together they own, manage and care for, the vast majority of England's historic environment. The Alliance takes a strong interest in planning policies affecting the historic environment through its Spatial Planning Advocacy Group. This response continues to focus on issues arising from our statement on Fixing the Foundations which is also attached.

Please find below our observations on the local plan system and how it should work to protect and enhance the historic environment. We look forward to contributing to your deliberations on the issues outlined in each section.

Our response:

1. Plans should follow the 'golden thread of promoting sustainable development' that runs through the National Planning Policy Framework: delivering economic, social and environmental benefits simultaneously (NPPF para 7-9)
2. A sound evidence base is needed to include all environmental constraints AND opportunities: to identify the character of areas and places and what makes them to help inform new development so it can positively contribute to this.
3. For the historic environment much of this information is already available through the Historic Environment Record that every Local Planning Authority should have access to and be contributing to.
4. In the Issues and Options stage of the local plan, early identification of environmental sensitivities on a site means the environment is likely to be seen as an opportunity to development with it, rather than a constraint that is limiting the potential of a site.
5. We support the need to carry out SHMA and SHLAA process but on site identification ensure environmental constraints understood early on so that development is concentrated in places with lower environmental interest and realistic amount of development on sites is proposed.
6. Fixing the Foundations focuses on brownfield sites, we agree that these sites should be identified for development either by the local plan site allocations or the other routes, but these brownfield sites may contain important but not identified heritage assets: it is therefore important that these brownfield sites undergo due assessment to see if there is heritage on the site that should be conserved in the development process but could help make a more successful development.

7. Local Plans need to have sound strategic environmental policies in the core strategy of the local plan. Then a sound concise policies on each area of the environment in the next level down parts of the plan, eg. the Development Management Plan. This is so the local plan interprets the NPPF policy clearly to give developers more certainty.

8. We think Supplementary Planning Documents are useful for informing what the issues are in sensitive places and on specific local environmental conditions, materials, habitats etc, again to make it clearer to developers if there are any issues that affect their sites

9. Consultation on different stages of local plans should be reviewed but it is important to have early engagement on what the issues and the options for development sites are, 'issues and options' stage.

10. We believe the review should look at what could be taken out of the Examination in Public stage to make it less confrontational, with more opportunity more common ground agreement, so the Inspector addresses the areas where there are conflicting views.

We hope you will the panel would find these points useful in their considerations and we would like the opportunity to meet the panel to discuss these issues further

We also look forward to working closely with DCLG and other relevant bodies on ways to achieve.

Charles Wagner  
Co-Chair  
Spatial Planning Advocacy Group  
The Heritage Alliance

Matthew Rabagliati  
Policy and Communications Officer  
The Heritage Alliance  
10 Storeys Gate  
Westminster  
London  
SW1P 3AY  
T: 020 7233 0500