

CLG Select Committee Consultation on National Planning Policy Inquiry

The Heritage Alliance

25th January 2016

Introduction: The Heritage Alliance

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 over 7 million members, Friends, 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](#).

We are responding briefly on areas that the Select Committee is seeking submissions on:

1. The proposals in the consultation affecting green belt land

1.1 We are concerned that land in Green Belts will now become two tier: pristine countryside which will still carry the full protection, and any land that has had a previous use – therefore regarded as Brownfield, which will be seen as potential for new housing development without due regard to sustainability issues. The whole emphasis of the NPPF is the presumption in favour of sustainable development, and without major infrastructure investment many of these brownfield sites are not sustainable.

1.2 At present there do not seem to be the necessary requirements to evaluate this land, especially if it is publicly owned land, in terms of its historic environment and natural environment interest and sensitivities before it is considered for disposal with a Permission in Principle for an agreed number of housing units.

1.3 One of the reasons for Green Belt Designation, as reiterated in the NPPF paragraph 80, is to preserve the setting and special character of historic towns. Again, as far as we can see, there are no safeguards in the proposals to amend the NPPF and in the Housing and Planning Bill to make sure that the implications of the changes to Green Belt and the proposed density increase around commuter hubs will require the setting of historic towns and smaller historic settlements to be considered before the decision to give the site Permission in principle.

2. Consequences of changes to the definition of affordable housing

2.1 Sustainable Communities are created where there is a mix of housing provision and therefore housing for all groups within society. We believe that extension to the definition of 'affordable housing' may skew new developments so that they deliver the affordable element and then, to make the site profitable, the rest of the development is the most profitable forms of housing.

2.2 We believe that for sites containing soundly constructed existing buildings, such as found on former military sites, encouragement should be given to providing affordable units within conversions of the existing buildings, as conversion should be less expensive than new construction and will allow new uses for the existing buildings which in many cases will be of historic interest.

2.3 The distinctiveness afforded by historic resources is acknowledged as key to the appeal not only to residents but also to other stakeholders including visitors and businesses.

3. The housing delivery test and its implications

3.1 The housing delivery test would seem to make local planning authorities allocate more sites for housing development rather than help them to ensure that sites granted consent are actually being developed. Developers will only develop sites when it is in their economic best interests to do so. We would have concerns that sites on greenfield land where there are potentially implications on the natural and historic environment, could be brought forward because they are in desirable locations and there are fewer unknowns and therefore cheaper to develop.

3.2 This would be at the expense of already allocated sites on previously developed land where development is needed for the regenerative effect it brings. Until that development has occurred the desirability of the area as a place to live is less obvious to home buyers and therefore it is a greater risk to developers to develop. Nothing in the proposed housing delivery test will deal with this.

4. Proposals on the use for housing of commercial land and developments

4.1 Sustainable communities need not only homes, but shops and services and places of employment. Though there have been examples where land has been allocated for employment or for a commercial use and it is highly unlikely that that use will ever be developed, there is need for local planning authorities to retain land for such uses even within the most desirable predominately residential areas, to stop these areas becoming dormitory towns and villages where travel by car is needed to go shopping, use services or go for employment or leisure.

4.2 We believe that these mixed use areas also maintain the character and appearance of our many towns, suburbs and villages that make up the nearly 10,000 conservation areas in England that are a precious part of the nation.

5. Other proposals in the consultation

5.1 We are aware that there is a great pressure to deliver a larger number of new homes every year to meet the growing need, However, we are concerned that in the rush to do this, some of the measures proposed in this consultation on revising the NPPF and in the Housing and Planning Bill, will lead to the loss or damage of heritage assets in England.

5.2 Although there is a need to speed up the process of giving planning permission for all new development, especially that which consents new housing, we think that it is essential that there is a requirement for an early proper assessment of every site in terms of its natural and historic environment potential, as well as its sustainability in the NPPF terms. This would allow sites which are of lesser environmental importance (NPPF Paragraph 157 bullets 7 & 8) and is sustainable by virtue of existing and planning infrastructure, to be prioritised.

6. The timing and length of the consultation

6.1 The UK has a much envied traditional of public consultation in planning and we are grateful for the Select Committee's intervention to extend the DCLG consultation on National Planning Policy Changes. Had the DCLG consultation not been extended after the intervention of the Chairman of this Select Committee and others, the Heritage Alliance would not have had the time to prepare an agreed response, nor to encourage its Members and others to respond likewise.

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