

The Heritage Alliance is the largest coalition of non-government heritage interests in England, bringing together 98 national organisations which are in turn supported by over 6 million members, volunteers, trustees and staff. Together they own, manage and care for, the vast majority of England's historic environment. The Heritage Alliance takes a strong interest in planning policies affecting the historic environment through its Spatial Planning Advocacy Group. This group includes representatives from The National Trust, the Council for British Archaeology, the Chartered Institute for Archaeologists, the Country Land and Business Association, the Campaign to Protect Rural England, and the Institute of Historic Building Conservation.

The Spatial Planning Advocacy Group drew upon the knowledge and experience of its members who met on 23rd July 2015 to draw up our response to the planning proposals in the Fixing the Foundations Framework here: <http://bit.ly/1HKADeZ> The questions below relate to Chapter nine, *Planning freedoms and more houses to buy*, and we hope these will be put before the Minister of State for Housing and Planning, Brandon Lewis MP, on 7th September 2015.

1. Safeguards for the Historic Environment:

- Can the Minister give further clarity on the proposed legislation and regulation changes in the context of the effect on environment protection, in particular the historic environment, and give his reassurance that appropriate safeguards to protect the historic environment will be put and kept in place?
- Can the Minister give reassurance that the sustainable development thread in the National Planning Policy Framework will also underpin the proposals in the Productivity Plan?

2. Brownfield Land Zonal System:

- Will brownfield sites that appear on a register after a Strategic Housing Land Availability Assessment process be tested through a Local Plan and NPPF compliance process?
- What will be covered under the 'limited number of technical details' before automatic permission on brownfield land is granted, and what scope will there be to seek planning conditions and obligations [Chapter 9.15]?
- Will the proposed measures to facilitate the delivery of brownfield land for housing contain adequate safeguards to ensure that the significance of any heritage assets are understood, and that such assets are adequately managed and protected in line with the National Planning Policy Framework?
- Will sufficient safeguards be put in place to exempt all heritage assets from automatic consent, and will provisions be put in place for the assessment, protection and mitigation of damage of those on brownfield development sites?

3. Invest in Local Authority Capacity

- Will the Minister consider that provisions are also sought so that each Local Authority has access to historic environment professionals and a well-maintained Historic Environment Record, which will help achieve the Government's sustainable development objectives while speeding up the planning process?

4. Design and setting:

- The need to build in a way that creates sustainable places, enhances heritage assets and townscapes are essential. Will these ideas be taken into consideration in the development of the proposals outlined in the Productivity Framework?
- How will general issues around design and local character be accommodated within the reformed planning system?

Community Engagement:

- Will the community element of the planning process, a key element of the Localism Act and planning policy, continue under the streamlined planning processes outlined in the Productivity Plan?
- Will community groups have input into the designation of brownfield sites and what is built on those sites?

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