

National Planning Policy Framework and National Model Design Code: consultation proposals

The Heritage Alliance Response

March 2021

The Heritage Alliance unites over 150 independent heritage organisations in England as a powerful, effective and independent advocate for heritage. As England's biggest coalition of heritage interests, it brings together independent heritage organisations from the National Trust, English Heritage, Canal & River Trust and Historic Houses, to more specialist bodies representing visitors, owners, volunteers, professional practitioners, funders and educationalists. Its members – 7 million volunteers, trustees, members and staff – demonstrate the strength and commitment of the independent heritage movement.

Do you agree with the [proposed changes](#) to:

Achieving Sustainable Development

We welcome the strengthening of paragraph 8c to state that a key objective of the planning system is not just 'to contribute to protecting and enhancing' but to 'protect and enhance' the historic environment. This is an important step to recognising the significant role the planning system plays in managing and improving our heritage.

Decision Making

The suggested changes to this chapter further restrict the use of Article 4 Directions, limiting their ability to perform their core purpose, defined as "to control works which could threaten the character of an area of acknowledged importance". A4 Directions are a crucial tool in protecting natural and heritage sites and in preserving local character; considering the recent consultations seeking to expand permitted development rights and the Government's increased focus on local character through their introduction of design codes, now is particularly not the time to narrow the use of A4 Directions. Any changes to the NPPF on this topic should bring it in line with the Government's existing guidance, endorsed by Historic England, that Local Authorities should use Article 4 Directions "where the exercise of Permitted Development Rights would harm local amenity, the historic environment or the proper planning of an area".

Conserving and enhancing the historic environment

The additional paragraph 197 will create significantly more work for church and amenity societies, but will be welcomed

The Heritage Alliance

5-11 Lavington Street,
London SE1 0NZ

T: 0207 233 0700 F: 0207 233 0700
policy@theheritagealliance.org.uk
www.heritagealliance.org.uk

Our members are non-government, voluntary and private organisations that promote, conserve, study and involve the public in our heritage.

The Heritage Alliance is an operating name of Heritage Link. Heritage Link is a company limited by guarantee registered in England and Wales Registered No. 4577804 Registered Charity No.1094793 Registered Office: 5-11 Lavington Street, London SE1 0NZ

by many for the increased protection it provides for historic assets.

If such a protection is to be extended to statues, we suggest that it is extended to include locally listed buildings. Currently, although the government is encouraging many assets to be locally listed, in areas outside of designated areas these assets can still be altered and removed without planning permission because of existing permitted development rights. The unsympathetic altering or demolition of a locally listed asset removes an important representation of local character and heritage, limiting people's opportunity to engage with their past and throwing away the opportunity to reuse and recycle materials. Ensuring that locally listed buildings need planning permission to be demolished or converted makes certain that there is the opportunity for investigations of a building's historic and community value.

15. We would be grateful for your views on the [National Model Design Code](#), in terms of *a) the content of the guidance*

We welcome the inclusion of 'heritage considerations' in assessing local character. We would like to commend that, in addition to the heritage aspects of a landscape that are visible, the archaeological features are also considered, because these contribute equally to the character of the landscape.

The codes will also need to ensure that they encourage diverse architecture within their landscapes. A design code implemented in the 70s in Essex led to uniform buildings rather than good design.

b) the application and use of the guidance

It will be crucial that the NMDC and local design codes integrate effectively. More detail needs to be provided on how this relationship will work.

Local design codes will also need to be carefully integrated and managed with the neighbouring areas. National Park authorities often have effective relationships with their neighbouring local authorities to ensure that their landscape is not negatively impacted by decisions made on their boundaries. Those implementing local design codes will need to work similarly to ensure that one local authorities' landscape compliments and blends with their neighbours'.

It will also be important that more detail is published on how landscape character will be taken into account in the design process, as this will be an essential aspect of protecting local, natural, and cultural heritage. LPAs must be provided with sufficient resources and expertise to produce local design codes and to meaningfully engage with local communities.

There is also concern among our members about the design codes, guidance and plans produced by developers, particularly in Paragraph 19 of the NMDC. It should be explicitly stated that developer and landowner design codes should conform to the NMDC and it should be considered whether these should be given equal weight.