



Changes to the current planning system
consultation
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Dear Sir

Changes to the current planning system consultation

The Institute of Historic Building Conservation is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

We are very pleased to have the chance to comment on the consultation document. The Institute's comments are as follows:

We do not propose to comment on the detail of the consultation on which lies generally outside our area of concern. However we would advise that we believe Planning is a creative process and it is important to take account of local circumstances, rather than imposing a national one-size-fits-all approach. It should be possible to introduce weightings and thresholds but this should be done without compromising local character and quality of design.

Q18: What is the appropriate level of small sites threshold?

- 1. i) Up to 40 homes**
- 2. ii) Up to 50 homes**
- 3. iii) Other (please specify)**

We do not have a general view on the small sites threshold but do wonder

how the small sites threshold will impact upon the requirement for the provision of affordable housing and to ensure this is maintained.

Q26: Do you agree with our proposal that information requirements for Permission in Principle by application for major development should broadly remain unchanged? If you disagree, what changes would you suggest and why?

Authorities can currently ask for full details where outline planning applications affect listed buildings and conservation areas. The same should apply for PIP applications also.

The consultation states that "Similarly, Permission in Principle will not be suitable for sites in areas where, applying the Conservation of Species and Habitats Regulations 2017, there is a probability or risk that the project is likely to have a significant effect on a European site, unless the application was accompanied by an appropriate assessment demonstrating there was unlikely to be significant impact on the site." We would question why it is not stated that Permission in Principle is also not suitable for sites with designated heritage such as listed buildings and scheduled monuments. These sites also require appropriate assessment to demonstrate whether there will be significant impact or not.

Q27: Should there be an additional height parameter for Permission in Principle? Please provide comments in support of your views. It is appropriate to limit Permission in principle to low rise building. Taller buildings can contribute to the character and quality of a place but need to be controlled to ensure they are not built in unsuitable locations. The scale and grain of local areas should be respected in the height of new buildings. Buildings should not impact detrimentally on existing skylines and at the more personal scale on streetscapes. The control of height of new buildings is especially important in the setting of historic buildings and areas.

Q31: Do you agree that any brownfield site that is granted Permission in Principle through the application process should be included in Part 2 of the Brownfield Land Register? If you disagree, please state why.

The national Brownfield Land Register map will automatically record those sites suitable for housing. Placing a Brownfield label on land does not make a qualitative judgement regarding the value of its current use, or a use that may have already been approved to go in its place. Brownfield land may currently be beneficially occupied and these uses should sometimes be maintained. We are concerned what the impact may be for the historic environment with this broad-brush approach. We are concerned that inclusion as Brownfield might inhibit the adaptive re-use of historic and traditional buildings or even encourage their demolition and replacement.

The reuse of redundant buildings, especially industrial and agricultural buildings, such as mills and barns, are currently delayed because developers claim they are unviable as an alternative to the development

greenfield sites. Buildings which should be reused, lie empty and in disrepair. Reuse of existing buildings is the most environmentally sustainable option.

Permission in Principle (PIP) changes may cause further viability issues across the historic environment. We suggest that a new subsidy is imposed to ensure historic building schemes proceed.

Q32: What guidance would help support applicants and local planning authorities to make decisions about Permission in Principle? Where possible, please set out any areas of guidance you consider are currently lacking and would assist stakeholders.

Conservation Area Appraisals (CAA) already give guidance on appropriate development in special areas, many of which are town centres. Development that pays attention to these Appraisals gives developers confidence to come forward for planning permission. CAA steer development in places that can and should be incentivised to change, without the destruction of quality, value and character that would come with deregulation.

Yours sincerely

Fiona Newton
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