



Planning Development Plans
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planmakingconsultation@levellingup.gov.uk

Dear Sir,

Consultation on implementation of plan-making reforms

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 and to respond to the questions posed. The Institute's comments are as follows:

- Question 1: Do you agree with the core principles for plan content? Do you think there are other principles that could be included?

Yes, core principles are a good idea in relation to content but there is a strong emphasis on visual aids and it is important to emphasise that complex concepts such as significance and certain values should have the teeth necessary to provide for appropriate enforcement measures to secure their protection, which often requires detailed analysis of complex matters

which require expert knowledge and training

- Question 2: Do you agree that plans should contain a vision, and with our proposed principles preparing the vision? Do you think there are other principles that could be included?

Yes a vision is a good enabling mechanism for getting communities to pull together but it must be followed through with objectives and targets for implementation of a broader vision. However visions in themselves will not sufficiently capture the uniqueness of the places they describe or the views of the communities that they serve. It will be important to strengthen the role of the vision in new-style local plans, ensuring they are more focused and specific and genuinely shaped by the views of representative communities.

- Question 3: Do you agree with the proposed framework for local development management policies?

The vision should be followed through with measurable outcomes for the plan period, underpinned by the planning authority's evidence base, which need to be actively monitored following adoption of the plan

- Question 4: Would templates make it easier for local planning authorities to prepare local plans? Which parts of the local plan would benefit from consistency?

Whilst, in principle, templates can assist in guiding contributions, it is critically important that any system to be implemented should not in any way be centralised and it essential for it to provide appropriate opportunity to recognise and respond to local circumstances. Local planning should be based on locally developed policies not centrally imposed development management policies. The local dimension in planning is especially important in underperforming areas. There is a great emphasis in this document on visual aids which is useful for communicating ideas but the language of the guidance is also most important in terms of having clarity about the values which are deemed to be important.

- Question 5: Do you think templates for new style minerals and waste plans would need to differ from local plans? If so, how?

- Question 6: Do you agree with the proposal to set out in policy that planning authorities should adopt their plan, at the latest, 30 months after the plan preparation process begins?

It is a short timeframe and it is unclear how the 30 month timetable will be met. Whilst we can understand the reason

for this timescale, we wonder if there any exceptional circumstances which may arise and be provided for should a temporary stop need to be applied on the timescale? This system needs to ensure that there is no loss of protection of the historic environment that is, in itself, complex and requires expertise and well informed knowledge to implement.

- Question 7: Do you agree that a Project Initiation Document will help define the scope of the plan and be a useful tool throughout the plan making process?
Yes, Probably a useful tool to get engagement up and running
- Question 8: What information produced during plan-making do you think would most benefit from data standardisation, and/or being openly published?
Critical content and templates which allow for flexibility to allow for local significance to be expressed appropriately. The local dimension of plan making is very important especially in underperforming areas.
- Question 9: Do you recognise and agree that these are some of the challenges faced as part of plan preparation which could benefit from digitalisation? Are there any others you would like to add and tell us about?
Yes but we have some reservations as indicated in answer to question 1.
- Question 10: Do you agree with the opportunities identified? Can you tell us about other examples of digital innovation or best practice that should also be considered?
- Question 11: What innovations or changes would you like to see prioritised to deliver efficiencies in how plans are prepared and used, both now and in the future?
Pilot studies and capacity training
- Question 12: Do you agree with our proposals on the milestones to be reported on in the local plan timetable and minerals and waste timetable, and our proposals surrounding when timetables must be updated?
We understand the reason for the timeframe but anticipate that there could be some circumstances which might require a pause on the schedule so that the plan will be considered
- Question 13: Are there any key milestones that you think should automatically trigger a review of the local plan

timetable and/or minerals and waste plan timetable?

- Question 14: Do you think this direction of travel for national policy and guidance set out in this chapter would provide more clarity on what evidence is expected? Are there other changes you would like to see?
- Question 15: Do you support the standardisation of evidence requirements for certain topics? What evidence topics do you think would be particularly important or beneficial to standardise and/or have more readily available baseline data?
- Question 16: Do you support the freezing of data or evidence at certain points of the process? If so which approach(es) do you favour?
- Question 17: Do you support this proposal to require local planning authorities to submit only supporting documents that are related to the soundness of the plan?
- Question 18: Do you agree that these should be the overarching purposes of gateway assessments?
- Question 19: Do you agree with these proposals around the frequency and timing of gateways and who is responsible?
The capacity and support for Inspectors would be of significant importance
- Question 20: Do you agree with our proposals for the gateway assessment process, and the scope of the key topics? Are there any other topics we should consider? *What mechanisms are in place where recommendations in reports are not being met, do they cumulatively increase for resolution at gateway 3 or is there a need to reschedule/ pause progress assessment?*
- Question 21: Do you agree with our proposal to charge planning authorities for gateway assessments?
This signals a shift of responsibility for payment. Is this workable and is there a budget at local level for this? With additional resources, would more funding be made available to ensure there is capacity in place to operate these inspections?
- Question 22: Do you agree with our proposals to speed up plan examinations? Are there additional changes that we should be considering to enable faster examinations?

In principle as long as there is capacity in place to implement this

Question 23: Do you agree that six months is an adequate time for the pause period, and with the government's expectations around how this would operate?

Subject again to capacity

- Question 24: Do you agree with our proposal that planning authorities should set out their overall approach to engagement as part of their Project Initiation Document? What should this contain?
- Question 25: Do you support our proposal to require planning authorities to notify relevant persons and/or bodies and invite participation, prior to commencement of the 30 month process?
- Question 26: Should early participation inform the Project Initiation Document? What sorts of approaches might help to facilitate positive early participation in plan-preparation?
Whilst it may be statistically important to note that people mostly prefer to consult online it is important that engagement should also be in person so that communities know what one and other think and the local plan is not just the composite views of individuals
- Question 29: Do you have any comments on the proposed list of prescribed public bodies?
*The list of bodies only includes on to comment on the historic built environment. Historic England appears to have been incorrectly titled in error as Heritage England.
Some of the 'infrastructure providers' listed appear to be ore landowners than infrastructure providers and if so might the National Trust and English Heritage be considered for inclusion similar landowning bodies.
The prescribed bodies could go beyond public bodies to bodies those organisations where expertise is held This could be an important aspect which could be addressed by IHBC and other heritage professional bodies.*
- Question 30: Do you agree with the proposed approach? If not, please comment on whether the alternative approach or another approach is preferable and why.
It is not clear where expert knowledge will be inputted to ensure that there is adequate information going into plans to inform protection and possible enforcement of protection for

the historic built environment where negative impacts could occur

- Question 31: Do you agree with the proposed requirements for monitoring?
Not sure that they would be adequate as they could be a box-ticking exercise only if not reviewed by appropriate professionals
- Question 32: Do you agree with the proposed metrics? Do you think there are any other metrics which planning authorities should be required to report on?
This may need to be reviewed to ensure it is fit for purpose
- Question 33: Do you agree with the suggested factors which could be taken into consideration when assessing whether two or more sites are 'nearby' to each other? Are there any other factors that would indicate whether two or more sites are 'nearby' to each other?
Is proximity really the appropriate issue or is it associative or comparative significance?
- Question 34: What preparation procedures would be helpful, or unhelpful, to prescribe for supplementary plans? e.g. Design: design review and engagement event; large sites: masterplan engagement, etc.
Proportionate assessment of appropriate quality principles
- Question 35: Do you agree that a single formal stage of consultation is considered sufficient for a supplementary plan? If not, in what circumstances would more formal consultation stages be required?
No, especially if there are important issues at stake or contested histories. Ongoing engagement apart from the two formal stages might assist here
- Question 36: Should government set thresholds to guide the decision that authorities make about the choice of supplementary plan examination routes? If so, what thresholds would be most helpful? For example, minimum size of development planned for, which could be quantitative both in terms of land use and spatial coverage; level of interaction of proposal with sensitive designations, such as environmental or heritage.
Yes

- Question 37: Do you agree that the approach set out above provides a proportionate basis for the independent examination of supplementary plans? If not, what policy or regulatory measures would ensure this?
Not sure as some cases are rather complex so proportionality needs to be recognised
- Question 38: Are there any unique challenges facing the preparation of minerals and waste plans which we should consider in developing the approach to implement the new plan-making system?
- Question 39: Do you have any views on how we envisage the Community Land Auctions process would operate?
The end use of the lands and appropriateness of proposed use would be important
- Question 40: To what extent should financial considerations be taken into account by local planning authorities in Community Land Auction pilots, when deciding to allocate sites in the local plan, and how should this be balanced against other factors?
- Question 41: Which of these options should be implemented, and why? Are there any alternative options that we should be considering?
- Question 42: Do you agree with our proposals for saving existing plans and planning documents? If not, why?
This will only work if the capacity is in place for the new system so that older documents may no longer be binding but that transitional arrangements are in place which accommodate all useful work which has previously been effected
- Question 43: Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

Yours sincerely

Fiona Newton
IHBC Operations Director