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BUILDING · CONSERVATION

Making Heritage Work

Rural Planning Review
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Dear Sirs

RURAL PLANNING: CALL FOR EVIDENCE

The Institute of Historic Building Conservation (IHBC) is the professional body for building conservation practitioners and historic environment experts working in England, Northern Ireland, Scotland and Wales, with connections to the Republic of Ireland. The Institute exists to establish, develop and maintain 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.

Thank you for inviting us to participate in this consultation. We wish in the main to respond to Questions 10 to 15 in Annex C.

Question 10 In your view, what planning issues need to be considered for development in rural areas?

We appreciate the economic and social drivers that have promoted the Government's view that the countryside (and therefore the nation) could benefit from increased use and activity as well as providing a contribution to delivery of much-needed housing. However, we would like to express the wish that this should not be implemented without due regard to the character of the countryside. The beauty of the English countryside provides enormous cultural and recreational pleasure to the public at large and is a world-wide tourist attractor; an economic driver widely promoted by the Government. Regrettably there is currently a strong policy trend towards the industrialization and suburbanization of the countryside which is tending to erode this character and which needs to be much more carefully nuanced.

A key aspect for all rural development is whether or not it is genuinely sustainable. There is evidence that many of those that wish to buy houses in the countryside make little contribution to the rural economy and rural life, especially those seeking second

homes. What were once workers' cottages have been extended beyond the reach of those on rural incomes. Rural bus services are being reduced and village schools closed. This points to the need for properly planned and co-ordinated development in the countryside, not simply an expansion of PD rights, to ensure that the quality of the countryside for all who live and work there and who visit is not eroded.

It is important that all development policy is based on proper evidence. This must take into account social, economic and environmental considerations in accordance with the principles of the NPPF. But the introduction of new measures and policy itself needs to be evidence based. In this respect we note the absence of any economic assessment attaching to the call for evidence. We urge that one is undertaken for any firm proposals which may emerge.

There is already much good practice occurring in rural planning including:

- Rural communities have the opportunity to engage in neighbourhood planning and provide for their own futures.
- The benefits to the economy from thriving tourism and heritage sectors.
- Redundant rural buildings of quality are being appropriately converted to serve new economic and social uses.

However there are aspects of policy that we consider undermine the quality of rural planning including:

- The general trend towards presumptions in favour of development means that important environmental, landscape, heritage and infrastructure considerations are sidelined, with the economic benefits often being limited to the developer alone.
- Because of the currently troubled nature of the property market, the high value of rural sites with planning permission promotes the construction of large properties with greater visual impacts than those of traditional rural housing and rarely housing affordable to local communities. Any expansion of PD rights can only exacerbate this.
- The capacity of the public purse to provide and maintain rural infrastructure (highways, land drainage, schools and other social services) is reducing year on year yet new development imposes further demands and impacts.

Question 11 In your view, are these issues given appropriate consideration in the planning process?

No.

Question 12 If not, how can these issues be given appropriate consideration in the planning process?

It is important that planning policy continues to stress the importance of balancing all material considerations, economic, social and environmental, to allow a proper assessment of sustainability to be made and that the processes for planning decision-making continue to provide the scope for this to occur.

Question 14 Are the current thresholds and conditions allowing change of use from agricultural to residential appropriate?

No. They are too formulaic and take inadequate account of the appropriateness of the site in landscape terms. Because the thresholds are based on the attributes of a building and/or site as existing, regardless of its landscape prominence, insufficient control is possible on the consequent landscape, heritage, environmental and infrastructure consequences of its development.

This policy was originally intended to allow the conversion of rural buildings of economic worth and visual quality to continue to provide positive benefit to the landscape and its history. But it has been developed into one in which virtually any existing building, regardless of its architectural significance, existing impact in the landscape or economic contribution to the development to be redeveloped as a dwelling (the extent of "conversion" is often minimal because of the requirements of the Building Regulations) with a domestic character and appearance stretching well beyond the volume of the building itself.

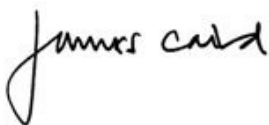
Question 15 What improvements could be made to the existing permitted development right allowing change of use from agricultural to residential?

The PD right should be reduced in scope and replaced with much clearer guidance on the handling of planning applications. This should include:

- Continued support for the residential conversion of traditionally constructed farm and estate buildings, particularly where this is combined with other economic or social benefits.
- Tighter controls and policy scope for the conversions of portal framed buildings, "pole barns", piggeries and other poor quality and utilitarian buildings for which the primary consideration should be the balance of economic, social and environmental benefits and impacts which should apply to all rural developments, rather than a volumetric or other technical assessment of the existing building.
- In all cases a major factor should be the character and appearance of the resulting building and its impact on the landscape and heritage of its locality, including the setting of listed buildings, historic landscapes and other heritage assets.
- National and local landscape designations (NP, AONB, local landscape significance) should be excluded from PD rights for change of use from agricultural to residential.

We hope these comments are helpful.

Yours faithfully



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