

4 April 2006

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### **Response to the Barker Review of Land Use Planning**

Firstly, may I thank you for agreeing to accept this response. HHA is a small organisation at HQ level and has been somewhat preoccupied in recent days with the ramifications of the Budget.

1. Many historic houses are either parts of integrated rural estate businesses or are otherwise contributors to and dependent on, the local rural and wider economy. To that extent the HHA, whose 1500 members include 500 houses open to the public, and generate upwards of £1.6 billion to tourism, supports the approach taken by the Country Land and Business Association (CLA), whose response we have seen. In particular we support the call for a review of the planning system not now but in a couple of years' time.

2. **Where we wish to, we make additional general and specific points below; where we do not, we support in general the points made by the CLA.**

3. HHA member houses also contribute to other government objectives, on education, participation rates in cultural activities – more people visit heritage sites than football matches – management of the environment, regeneration and promotion of inward investment to rural areas.

#### **Question 1**

4. Planning policy should encourage development to embrace and support successful heritage conservation.

5. There should be recognition in EH and Local Planning Authority (LPA) polices that **non residential listed buildings** need an underlying economic use to

secure their future. Sympathetic conversion is a much better outcome than a descent into dereliction. The 2005 Heritage Counts report is to be commended for its recognition of this reality, in particular in relation to the conversion of farm buildings.

6. The review of the **Class Consents Order for ancient monuments** should also look to viable management of land around monuments, including with the support of Stewardship, as the best guarantor of the condition of the monuments.

7. LPAs should be guided to view heritage buildings and conservation areas as positive contributors, wherever possible, to economic regeneration and the quality of life within their areas. This does not mean a blanket ban on new development or modern buildings in town centres; rather a focus on conserving good design, whatever the vintage. Also, dogmatic adherence to protection in planning policies can lead to buildings deteriorating or falling down and LPAs should be guided that allowing an economic use for heritage buildings is often the best way to secure their future.

8. There should be a presumption in favour of **enabling development**, within the broad terms of the Local Development Framework, to enable historic house owners and managers to find economically viable ways to secure the long term future of this unique contribution to our heritage. In this way the planning system should be seen as a positive policy tool, to enable players in the economy to fulfil wider government objectives (in this case the objectives of conserving heritage, encouraging recreation, promoting tourism and a successful rural economy), rather than as a method primarily of development control.

9. Where there are unavoidable conflicts between development and conservation imaginative solutions will be needed. A comprehensive resolution of the conservation and access problems for Stonehenge may look expensive now, but stands to produce a legacy that will bring benefit in the future.

10. **World Heritage designations**, when used as a positive brand and when backed with financial resources, can assist in the enhancement of heritage, the visitor experience and the local economy. The financial commitments entailed in interpretation, access management and maintenance must be met with funding to go with the designation. At the same time any new constraints imposed on owners must be in proportion to the distinctiveness of the site and be practical to follow.

## **Question 2**

11. We also see a danger that above the district level, regional spatial strategies have not been particularly successful in integrating the needs of the urban and rural economies, and the needs for limited additional mixed housing and rural economic development within the rural areas. If planning at county level were to be downgraded in importance or disappear, this gap in more integrated planning will have increasingly worrying consequences for integrated growth and heritage and environmental management in rural areas.

## **Question 3**

12. As the CLA says: “all three pillars of sustainable development are important, but ultimately environment and community depend upon the economic pillar. Thus a healthy environment and community cannot be sustained without a viable rural economy”. Historic Houses, gardens and castles play a key role in contributing to both the economy of rural areas and to its quality of life. They are a magnet for inward investment and often stand at the centre of rural businesses that integrate: environmental management (inside and outside the house); social objectives, through employment and skills retention and sometimes low cost local housing; and economic objectives.

13. The planning system pays some heed to this but is unimaginative in failing to see that this true sustainability in rural areas depends upon private passenger and freight transport. Any assertion that sustainability should be based around points of access to public transport leads to decisions that preclude just the sort of desirable, well designed and suitably scaled development in rural areas, including tourism that is needed to underpin environmental management and communities. That is not to say that public transport should not be supported where there is an enduring demand.

#### **Question 4**

14. No additional comments

#### **Question 5**

15. There is uneven evidence that changes to PPG 7 in 2001 and the introduction of PPS 7 in 2004 have enabled more suitably positive planning decisions in the countryside in favour of well designed and suitably scaled development. PPS 7 is qualified and complicated by overlain policies on sustainability, national parks, AONBs and green belts.

#### **Question 6**

16. No, although we have to accept that this will always be a problem if there is a conflict between planning at two levels of government, such as the county and district, or district and national, where the democratic mandate does not run in the same direction. There are other cases where joining up could be improved, for example if the new body, Natural England, is to have a remit that does NOT require it to pursue sustainable development based on the three pillars (but based on the primacy of the environmental pillar), then there will be conflicts between the desires of local communities and the businesses on which they depend, and the national body.

#### **Question 7**

17. No additional comments

#### **Question 8**

18. It is very likely that a Planning Gain Supplement, levied on small developments and levied in particular on commercial developments within integrated

rural estates where there is no sale of land or buildings to realise a planning gain, WILL deter desirable investment.

#### **Question 9**

19. It is clear from the difference in the value of land with different types of planning permission that occupation costs are related to planning constraints. The extent to which these are relaxed is a balance between the desire to improve productivity and the desire to maintain an attractive rural environment, so it does not follow that all constraints should be completely removed.

#### **Question 10**

20. No additional comments.

#### **Question 11**

21. No additional comments.

#### **Question 12**

22. Closer liaison between development control and economic policy sections of local authorities would be highly desirable, as this has yet to be achieved in all LPAs.

#### **Question 13**

23. No additional comments.

#### **Question 14**

24. The incentive structure would certainly be **hindered** by the introduction of a **Planning Gain Supplement** regime that transferred the planning gains from relatively small rural development schemes away from the local communities that could otherwise benefit. Not only would this disadvantage these communities (to the advantage of other larger communities elsewhere), but the PGS operated in this way would make such desirable local development LESS popular, and those who were behind the applications less popular too. All this would weaken the link that should exist between economic development, social cohesion and environmental stewardship – an own goal all round.

#### **Question 15.**

25. No additional comments.

**Nick Way**

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Historic Houses Association

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