

**WORLD HERITAGE UK**

**RESPONSE TO**

**“PLANNING FOR THE FUTURE” WHITE PAPER**



World Heritage UK

## SUMMARY OF KEY MESSAGES

### WH:UK urges that:

**there should be statutory recognition of World Heritage Sites (WHSs) and their buffer zones/settings.** WHSs are the nation's premier heritage sites, which the Government, as a State Party under the World Heritage Convention, has an obligation to the world to protect.

**planning policies and decisions in relation to World Heritage Sites and their buffer zones/settings should be monitored and formally considered by Parliament on a three-yearly basis, to ensure that the international responsibilities of the State Party are met through the planning system.**

**the key criteria in decision-making are quality and outcome.** Decisions should be properly evidence-based and maintain or improve the existing degree of protection for WHSs. Better design and faster decision-making are acceptable within this context.

**thorough and independent assessments should continue to be made of the environmental and heritage impact of development proposals in World Heritage Sites and their buffer zones/settings.**

**Local Plans should continue to set out a decision-making framework for individual WHSs and their settings, because of the wide variety of size and type of Site. Discretionary decision-making on development proposals in WHSs and their buffer zones/settings should continue.** Quality and appropriateness of design should respect the Outstanding Universal Value and attributes of each site and their local character.

**with the proposed abolition of the Duty to Cooperate, all Local Plans that together cover an individual WHS and its buffer zone/setting should be required to take a consistent approach to planning for that Site and its buffer zone/setting.**

### WH:UK supports:

**the commitment for a reformed planning system "to continue to protect the places of environmental and cultural value which matter to us".** Indeed, UNESCO World Heritage Sites, by definition, matter to the entire world.

**the ambition for the planning system to play a stronger role in promoting climate change mitigation and adaptation, and encourages this to be a stronger ambition throughout the White Paper**

**the development of a comprehensive resources and skills strategy for the planning sector .** This strategy should include resources and skills relating to WHSs. It should also consider how to resource WHS management teams to enable them fully to engage with the planning system.

### WH:UK is concerned:

**that the proposed new system potentially offers less protection to WHSs and their buffer zones/settings than the current system.** There is scarcely any mention of WHSs in the White Paper and there is little to indicate how Sites will be protected or their status recognised. A new planning system must offer at least the same level of protection as now.

**that the proposed threefold categorisation of all land is over- simplistic for the management of WHSs.** Because Sites are varied and complex, they will not fit easily into any single category. All planning applications should be handled as though WHSs and their buffer zones/settings are protected zones, allowing local factors to be taken into account and for adaptation to changing circumstances.

**about the effect of the proposed increase in central control at the expense of local decision-making.** The determination of housing provision must not be done nationally because it is impossible at that level to take into account the ability of different areas to accommodate new development, including the impact on individual World Heritage Sites and their buffer zones/settings.

## **Background**

UNESCO World Heritage Sites (WHSs) are recognised because of their outstanding value to humanity. They are irreplaceable sources of life and inspiration, and are seen as belonging to all the peoples of the world irrespective of the territory on which they are located.

England has 19 WHSs and 1 shared with Wales (Pontcysyllte Aqueduct and Canal). They vary greatly in size, from entire cities (e.g. Bath) and regions (e.g. the Lake District) to small groups of buildings (e.g. the Tower of London). Some are compact (e.g. Durham Castle and Cathedral) and others stretch over substantial distances (e.g. the Dorset and East Devon coast and Hadrian's Wall). The reasons for their inscription also vary greatly and include history, religion, culture, industrial development, scientific advancement, botany, landscape and geology/geomorphology.

As well as having international Outstanding Universal Value<sup>1</sup> (OUV), these Sites have value nationally and locally. Many bring economic, social, cultural and environmental advantages with them. WHSs are significant tourism assets, although some are not yet recognised as such. In 2018 it was estimated that the English Sites were visited by some 53 million visitors, many from overseas and thus, in normal times, they make a significant contribution to both local and national economies. They can create jobs in Site management and education, as well as in the tourism and hospitality sectors, transport, retailing and the arts. They can contribute to enhanced inward investment for Site conservation, restoration and regeneration and be exemplars of climate change mitigation and adaptation. As part of the worldwide network of World Heritage Sites, the England, and UK sites generally, contribute to the UK's international reputation for responsible stewardship.

A review by WH:UK of the UK's sites in 2017/18 found that WHSs could, in addition:

- generate a sense of place, enhanced civic pride and identity, and encourage community stewardship
- provide resources for education and raising heritage and cultural awareness
- offer a common framework of values for managing development and other changes.

As a State Party signatory to the World Heritage Convention (1972), the United Kingdom is required to protect, preserve, present and transmit to future generations its WHSs. Together, the planning systems of the four administrations are one of the principal tools with which the UK fulfils this requirement.

In 2018 WH:UK issued a Position Statement "Planning and World Heritage". The Statement drew together the findings of a workshop of World Heritage practitioners held the previous year. At present, the principles of discretionary planning are shared with the other devolved administrations in the UK which contain a further 8 World Heritage Sites (in addition to 4 in the Overseas Territories). The workshop considered a number of planning issues in the four administrations together with how the key interested parties could improve the workings of

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<sup>1</sup> UNESCO defines OUV as cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity. A property's "attributes" are the physical elements, and tangible or intangible aspects or processes of the property that expresses the OUV.

the systems as they stood. There was no call for a fundamentally different approach to planning.

This response assesses how the Government's proposals for a new planning system in England would help meet the State Party's responsibilities for WHSs and help safeguard and enhance the wider benefit that World Heritage inscription brings internationally, nationally and locally. It draws on WH:UK's Planning Position Statement. This response has also been subject to consultation with England's Site coordinators. WH:UK would be very pleased to discuss with the Secretary of State any of the points raised.

## **Pillar One – Planning for development**

### ***1. What three words do you associate most with the planning system in England?***

In respect of World Heritage Sites: essential, protection, accountability

### ***2(a) Do you get involved with planning decisions in your local area?***

WH:UK is a membership charity comprising representatives of the UK's World Heritage Sites and other interested parties. It recognises that complex issues can be raised by planning proposals, which often reflect the difficult tensions between the need for new development alongside conservation, sometimes in dynamic and regenerating urban and rural areas. Although WH:UK may be involved in helping to shape wider UK planning policy it does not normally take a position on individual planning cases or applications.

### ***2(b) If no, why not?***

Regarding involvement in planning decisions by Site coordinators, WH:UK is aware that some coordinators do not have the resources and expertise to engage with planning decisions. It is essential that they are provided with the resources needed if they are to have meaningful engagement. It is hoped that this issue will form part of the proposed comprehensive resources and skills strategy.

### ***3. How would you like to find out about plans and planning proposals in the future?***

WH:UK would like to be informed through social media (including email). Individual Sites will have their own preferences.

### ***4. What are your top three priorities for planning in your local area?***

WH:UK has a national perspective on both natural and cultural issues for WHS. Of the choices given, its top priorities are protection of existing heritage buildings or areas; the environment, biodiversity and action on climate change; and the design of new homes and places. It recognises the other options are all important aims for the planning system.

## **A new approach to plan-making**

### ***5. Do you agree that Local Plans should be simplified in line with our proposals?***

No. WHUK agrees that there could be some simplification of the existing system of plan-making and its evidence requirements. However any simplification should not undermine the comprehensive and Site-specific understanding of WHSs and their buffer zones/settings, and of robust and discretionary decision-making.

WH:UK considers the proposed threefold categorisation of land to be too simplistic. WHSs, because of their variety of size and type, cannot, as a group, be fitted into any one category. For all Sites, it is of the utmost importance that the Sites and their buffer zones/settings are

protected from development that would threaten their OUV and attributes. For this reason, WHSs must have statutory recognition, alongside existing national heritage, environmental and landscape designations. (For further details, see our response to the section “Effective stewardship and enhancement of our natural and historic environment”). Such recognition would not debar development within Sites and their buffer zones/settings – it may be needed to support the management, educational potential, regeneration, climate change response and viability of Sites. The type and scale of appropriate development will vary from one Site to another, but in all cases should enhance the sense of place.

The White Paper leaves unaddressed a number of questions regarding the operation of the threefold categorisation of land:

- How will WHS buffer zones/settings be treated, given their importance to each Site?
- How will the potential impact of growth or renewal areas on the visual, functional and strategic development setting of protected areas be treated?
- How will any variations within categories be considered and delivered?
- How will the boundaries of categories remain dynamic?
- What happens where one category of land meets another?
- How will possible conflicts arising from growth, renewal and protected areas be resolved?

WHUK requests that these matters be fully considered before a new system is introduced.

***6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development policies nationally?***

In part, WH:UK agrees that Local Plans should not duplicate national policies. However national policies cannot address issues specific to individual places and sites, nor can they give clear guidance at the local level to resolve locally-specific competing interests in the use of land. Further at whatever level development management policies are set, there will always be differences of interpretation which need resolution. So a rules-based system may not provide the speed of decision and confidence which the White Paper seeks.

WH:UK notes that the White Paper proposes that Local Plans will clearly identify WHSs, but does not set out how they will be treated. In its view, Local Plans should continue to set out a decision-making framework for WHSs and their buffer zones/settings. Discretionary decision-making in relation to these areas should also continue.

In general, WHUK prefers the alternative approach to development management put forward in the White Paper, where the use of land outside growth areas would be determined by the local planning authority and be subject to the existing development management process. In this context, as well as urging that WHSs are given statutory recognition, we would also strongly suggest that Site Management Plans should be material considerations in both Plan-making and development management. Further there should be allowance for development management policies to reflect sustaining attributes of OUV, and in this respect the NPPF should not be too prescriptive.

Whichever route is chosen, planning policies and decisions in relation to World Heritage Sites and their buffer zones/settings should be monitored and formally considered by Parliament on a three-yearly basis, to ensure that the international responsibilities of the State Party are met through the planning system.

***7(a) do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?***

With qualification. WH:UK agrees that there should not be duplication of effort between appraisals and that some clarification is needed to avoid this. It would have been helpful if the White Paper had defined “sustainable development” in this context. That aside, for those WHSs which are inscribed for the value of their natural heritage, environmental impact assessments (EIAs) are essential to identify how development would impact on a Site and its buffer zone/setting. Further, WH:UK strongly supports the use of Heritage Impact Assessments (HIAs), preferably using the methodology that has been developed by the International Council on Monuments and Sites (ICOMOS). WH:UK believes that this methodology should be made statutory for WHS and their buffer zones/settings. HIAs are not mentioned in the White Paper, but they are essential to inform development decisions to ensure that the value of heritage is properly taken into account in decision-making. The World Heritage Committee encourages the use both of EIAs and HIAs.

Finally, any assessments that are made should be done by an independent body so that there is no dispute about the findings.

***7(b) How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?***

WHUK is concerned that the White Paper does not set out the Government’s proposals on this issue. While there is a suggestion of joint planning arrangements, the White Paper does not define how these would work.

Cross-boundary issues specific to WHSs can occur when a Site and/or its buffer zones/settings fall in the jurisdiction of more than one planning authority. It is a common situation for many Sites including the Royal Botanical Gardens, Kew, the Lake District and the City of Bath. In the case of Bath, the loss of the Duty to Cooperate could result in increased levels of formal protection if a formal buffer zone were required to ensure protection of the Site.

Another consideration is that the abolition of the Duty to Cooperate does not reflect the ambition in the Government’s own 25-year environment plan to work at the landscape scale together with the wider sectoral move to integrate environment and cultural considerations. At the landscape scale, habitats, natural heritage and cultural heritage do not conform to administrative boundaries. Therefore, the policies and rules that may impact upon them should not be constrained by these boundaries either.

WH:UK therefore suggests that, with the proposed abolition of the Duty to Cooperate, all Local Plans that together cover an individual WHS and its buffer zone/setting, should be required to take a consistent approach to planning for that Site and its buffer zone/setting.

***8(a) Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?***

No. The provision of land for housing is a significant issue for WHSs for two reasons. Firstly, new development can threaten Sites and/or their buffer zones/settings and secondly, new housing of an appropriate scale and design can help support the viability of Sites and on, brownfield sites, support new growth.

Regarding the first reason, WH:UK is very concerned about the proposal to determine housing requirements nationally and to focus on areas where affordability pressure is highest – i.e. where demand is highest. This will simply increase pressure for new development where it is already at its greatest. Many WHSs are in such areas, and WH:UK is concerned that putting even more pressure on these areas could threaten any Sites and buffer zones/settings within them.

Further, areas of high-quality environment, by their very nature, are often areas where the pressure for new housing is high. The environmental designations that exist in local areas have been applied over the years with public involvement. Further, many WHS steering groups and/or coordinators understand the individual needs of their local communities and the pressure on housing within their Sites. They also understand the need to provide for affordable housing while weighing up the impact on the cultural landscape, in areas such as the Lake District. Setting a housing requirement nationally for areas of high affordable need where pressure on housing is great due to high landscape or environmental value will not respond to local needs within a WHS. Neither does such an approach sit comfortably with community involvement, which is an important element in decision-making in many Sites and a stated objective of the White Paper.

It is simply not possible at the national level to take account of all the supply and demand factors which should be considered in this process (especially supply factors). The White Paper acknowledges that this is a highly contested part of the planning process and it is so for good reason. It must be informed by local as well as national and cross-boundary considerations, including the impact of the scale of new development on WHSs and their buffer zones/settings. WHSs vary enormously in type and size, and the impact of major new development on each Site will vary greatly. This is not simply a matter of lines on a map – one size does not fit all.

The alternative option set out in the White Paper would address at least some of WHUK's concerns by allowing housing needs to be locally determined. Nevertheless, the concern about increasing pressure in already pressurised areas remains.

In this respect, WH:UK recommends the revisiting of Green Belt boundaries that do not provide additional protection to WHSs and/or their buffer zones/settings or other heritage assets. In some areas, the identification of some additional land for development within current Green Belt boundaries may help relieve pressure on WHSs and/or their buffer zones/settings. In others, such as the Derwent Valley Mills and its Buffer Zone, Green Belt protection is urgently needed because, at present, decision-makers seem to have a much better grasp of the importance of Green Belt compared with WHS buffer zones/settings. In any case, given that WHSs have demonstrable international value, it is illogical to give sacrosanct protection to Green Belts, some of which may be of indifferent environmental quality, whilst giving relatively little attention to WHSs.

WHUK also suggests that, for some WHSs, consideration should be given to changing policy on change of use to second homes and holiday homes, given housing needs, limited development opportunities and the need to ensure viable communities in WHS.

***9(a) Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent?***

WHUK would need to be assured that areas for substantial growth would be outside WHSs and their buffer zones/settings and that arrangements would be made for appropriate archaeological exploration if it were thought that a development area might contain important archaeological evidence that related to a WHS.

In the undesirable event that Growth areas be identified that contain WHSs in whole or in part, there must be very specific policies set out nationally to protect the OUV and attributes of WHSs in these areas, including a requirement for call-in and inquiry.

***9(b) Do you agree with our proposals above for the consent arrangements of Renewal and Protected areas?***

WHUK believes that all development proposals within a WHS or its buffer zone/setting should be determined by planning applications being made to the local authority. Proposed

development should not harm the OUV and attributes of a Site. Decisions should be informed by Heritage Impact Assessments, which should be integral to the system, and, where appropriate, Environmental Impact Assessments. Decisions must also take account of the cumulative impact of smaller developments on WHSs and their settings.

In this respect, WH:UK is concerned by the White paper's criticism of discretionary planning decisions. World Heritage Sites and their buffer zones/settings are often complex and highly individual places where discretion is essential when determining proposals for new development. A more simplistic approach to planning would escalate the risks which endanger the UK's most valuable heritage assets.

Regarding faith in local councils, practitioners suggested that some councils need to have a better appreciation of the value of Sites within their boundaries. Also planning departments do not always have the heritage expertise needed in making development decisions. In this respect, WH:UK supports the development of a comprehensive resources and skills strategy for the planning sector, provided that strategy includes resources and skills relating to heritage and WHSs in particular. It is clear that there is a shortage of heritage skills in many planning departments and this needs to be addressed. The key issue for local authorities is resources. Indeed the current system would work more speedily if authorities had additional resources.

***9(c) Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?***

Whichever process is followed, it should be transparent and allow for the involvement of the community (including WHS Site coordinators or other Site representatives). Experience with Nationally Significant Infrastructure Projects is that they are very demanding on the financial and staff resources of Sites, and many Sites cannot afford either.

***10 Do you agree with our proposals to make decision-making faster and more certain?***

For WH:UK, the most important criteria for decision-making are quality and outcome. The current planning system has, with some important exceptions, provided WHSs with the protection they need while allowing the development necessary to assist with their management and viability. A less complex and speedier system, unless it was properly evidence-based and did not result in any lessening of the protection and conservation of WHSs and their buffer zones/settings, could result in WHSs being placed on the UNESCO World Heritage in Danger list, and losing their status altogether. The proposals in the White Paper give the impression that this situation could become more, not less, likely. WHUK pointed out the importance of undertaking appropriate environmental or heritage impact assessments in its response to question 7(a).

The system should be tightened up so that developments to which UNESCO strongly objects and may result in the loss of WHS status should be subject to call-in and inquiry. This would ensure that the state party fulfils its obligations under the World Heritage Convention to protect, preserve, present and transmit to future generations its WHSs.

***11 Do you agree with our proposal for accessible, web-based local plans?***

WHUK supports more engagement in the planning process (and not only local plans), particularly if this ensures that Site coordinators or other Site representatives are better involved in making planning decisions on proposals that affect their Sites and their settings. It also supports the aim of improving the user experience of the planning system by making planning information easier to find and understand and more accessible.



These proposals must be fully costed and funded before implementation. If they involve a significant amount of investment in new equipment and training by and for users, some Sites may not have the necessary financial or staff resources or expertise. Unless the Government provides funding for this purpose, its aim of greater involvement in the planning process would be threatened.

A related issue is the need for good quality digital data which the proposals would require. The availability and quality of this data is highly variable, mainly because of the variability of the investment required for its collection and its uploading. This issue will need to be addressed if the Government's aspirations in this area are to be met.

***12 Do you agree with our proposals for a 30-month statutory timescale for the production of Local Plans?***

No – it is unrealistic if the Plans are to be robust, properly evidence-based and have greater public engagement. Some Local Plans will be more complex than others – the scale and scope of issues in cities are very different from those in rural areas. Also there is great variety in the size of planning authority areas. The timescale for the production of each Plan should be individually agreed with each local planning authority.

***13(a) Do you agree that Neighbourhood Plans should be retained in the reformed planning system?***

Yes. Neighbourhood Plans need to be retained in order to ensure that local knowledge can influence development so that it delivers appropriate outcomes best suited to the local communities, including locally distinctive design and conservation of the built and landscape environment. This can be helpful when individual WHSs contain a variety of nuance and spatial diversity.

***13(b) How can the neighbourhood process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?***

Neighbourhood Plans are a possible source of information regarding design information especially where a Character Appraisal containing design information has been prepared for the area. They are excellent tools for policies, allocations and design guidance to identify the importance of a WHS and its buffer zone/setting in their locality and how the Site is best conserved and enhanced at a very localised level.

***14 Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?***

Action should be taken on land banking, where prime housing land is held as an investment opportunity to increase value rather than to develop. This situation pushes up prices and forces housing development onto less favourable sites, some of which may threaten WHSs and/or their buffer zones/ settings.

**Pillar two – Planning for beautiful and sustainable places**

***15. What do you think about the design of new development that has happened recently in your area?***

It is a mixed picture. In some instances, great care has been taken to incorporate contextual cues and make careful contemporary reference, both internally and externally, to the traditional building forms. However, all too often, after design quality is assured by a developer, it is significantly eroded and local distinctiveness is lost in large developments. This has happened, for instance, within the Derwent Valley Mills WHS. This erosion should not be permitted in such sensitive sites.

**16 Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?**

In terms of the UK's contribution to achieving the UN's 17 Sustainable Development Goals, WHSs address the following, based on the Government's interpretation and expressed ambitions for achieving the SDGs:

*Goal 1: End poverty in all its forms everywhere*

WHSs can create jobs in Site management and education, as well as in the tourism and hospitality sectors, transport, retailing and the arts. They can also contribute to enhanced inward investment for Site conservation, restoration and regeneration. These benefits are particularly significant at Sites in remote or low-wage areas.

*Goal 3: Ensure healthy lives and promote well-being for all ages*

Many WHSs give the opportunity to connect people with the environment, and many have been and are significant for people during this Covid 19 pandemic.

*Goal 4: Ensure inclusive and equitable quality education and promote life-long learning opportunities for all.*

WHSs have a significant role in education through interpretation, research, field trips, working with local schools, colleges and universities, being exemplars of good practice in conservation, management and partnership working, and offering volunteer opportunities. WHSs offer these advantages from international to local levels.

*Goal 6: Ensure availability and sustainable management of water and sanitation for all:*

WHSs help to pass on to the next generation a natural environment protected and enhanced for the future. In particular Sites may encourage thriving plants and wildlife, use resources from nature more sustainably and efficiently, enhance beauty, heritage and engagement with the natural environment, mitigate and adapt to climate change, and encourage thriving rural communities and economies.

*Goal 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.*

As per Goal 1, WHSs can create jobs in Site management and education, as well as in the tourism and hospitality sectors, transport, retailing and the arts. They can also contribute to enhanced inward investment for Site conservation, restoration and regeneration. These benefits are particularly significant at Sites in remote or low-wage areas.

*Goal 13: Take urgent action to combat climate change and its impacts*

WH:UK and individual WHSs are working to mitigate and adapt to climate change both by providing education about material use, building methods and design in historic energy-efficient buildings, making preparations for coastal change and how Sites can take active measures in this respect.

*Goal 15: protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss*

WH:UK supports the Government's stated objective of mainstreaming biodiversity net gain when granting planning permission. Some Sites have been actively involved in the delivery of the factors listed above.

***17 Do you agree with our proposals for improving the production and use of design guides and codes?***

Yes, provided that where WHSs, such as Derwent Valley Mills, have already produced a design rationale as part of their Management Plans, these should be endorsed as the design guides for the area. Where such design guides have not been produced, WHS Site Coordinators or other Site representatives should be fully involved in the production of any codes that affect Sites or their settings. There needs to be recognition of local distinctive character and materials not just in conservation areas and listed buildings but also in WHSs and their buffer zones/settings.

In areas where there is a presumption to develop, this presumption should not weaken design and the use of appropriate local materials. Further, careful consideration should be given as to how better design will be achieved whilst increasing permitted development rights and introducing the automatic granting of planning permission if 8-week dates/timescales not met.

***18 Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?***

WH:UK agrees with a greater focus on place-making and points out that WHSs make a significant contribution in this context.

WH:UK is nevertheless concerned about the imposition of design codes on WHSs from a centralised body of design experts. While design may be a significant feature of many Sites, it is rarely the main reason for their inscription. The first priority is that the design of new development must make reference to the OUV and attributes of each Site and its buffer zone/setting. There is already confusion about this issue and WH:UK would not want to see it compounded.

Further, the proposal that there should be a new body to support design coding and building better places does not address issues of design response to local areas. Great design does not exist in isolation - it becomes part of a wider landscape, urban fabric and community. It needs to deliver against these categories as well to be qualify.

Design is a highly subjective issue. This is illustrated by the treatment of a development proposal in the setting of the Royal Botanical Gardens, Kew WHS. the promoters of the proposed new building at the "Chiswick Curve" claimed that it was of 'great design'. This claim was supported by an inquiry inspector but rejected by the Secretary of State.

WH:UK does not support the suggestion of each authority having a chief officer for design and place-making alone. Planning embraces a much wider range of issues – economic, social and environmental (including heritage) – than design and place-making. Each authority should have a chief planning officer to address this broader range of issues.

***19 Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?***

No comment.

**20. Do you agree with or proposals for implementing a fast-track for beauty?**

No. WH:UK supports the general aim of expecting new development to have a high quality of design, but with a number of reservations.

First, much depends on the definition of “beauty”. The National Design Guide rightly refers to a wide range of issues that should be taken into account when proposing development. However, it does not set out in any detail how these issues should be addressed and how any conflicts between issues should be resolved. (The NPPF of course does do this.) Is the sum total of the ten characteristics and their component parts what defines “beauty” or is the White Paper thinking of a narrower definition (which it seems to imply but does not define)? If the latter, then the Design Guide’s recognition of the matters to be taken into consideration when assessing development proposals, together with any other issues set out in the NPPF, provides good reason why “beauty” cannot be the sole reason for fast-tracking proposals.

Secondly and to repeat, beauty is a highly subjective issue. How can a proposal be judged beautiful or otherwise? Who will/should make this judgment? Fast-tracking would leave this judgement in the hands of the developer/site owner.

Thirdly not all new development should necessarily be beautiful. In WHSs, design should be guided by context, as the Design Guide recognises. Not all sites have buildings or other development that could be described as beautiful, but which nevertheless are significant elements of the Site which new development should respect. In such cases, “beautiful” development would be inappropriate. That is not to say that in some Sites, contemporary design can be compatible and exciting if done properly. Given the variety of Sites, design is best dealt with on a case-by-case basis and with proper scrutiny.

Fourthly, the cumulative impact of development is an important issue for some WHSs and their buffer zones/settings. Fast-tracking development proposals for beauty would not allow the proper consideration of this issue.

### ***Effective stewardship and enhancement of our natural and historic environment***

The White Paper makes several proposals on the effective stewardship and enhancement of the natural and historic environment, both in its introductory parts and this section in particular. They are of obvious interest to WHUK. Unlike other parts of the White Paper, it does not seek views on these matters. Nevertheless, WH:UK wishes to make a number of comments.

WH:UK strongly supports the suggestion early in the White Paper that the planning system should promote the stewardship and improvement of the countryside and environment, the preservation of important natural assets, net gains for biodiversity and the wider environment and actively to address the challenges of climate change. WH:UK and WHSs are working on climate change mitigation and adaptation, and WH:UK is planning to make these issues the subject of its annual conference in 2021.

WH:UK welcomes the Government’s commitment to use the planning system to promote environmental recovery and long-term sustainability. WHSs are already engaged in these issues, as described earlier (see answer to question 16).

WH:UK also welcomes the proposed assessment of planning policies and processes to manage flood risk. Several WHSs including Derwent Valley Mills, Ironbridge Gorge and Studley Royal Park/Fountains Abbey, have been severely affected by flooding.

One of WH:UK’s principle concerns, however, is that there is currently no statutory recognition of WHSs in primary legislation, unlike AONBs, SSSIs, conservation areas and other nationally protected areas. This is a serious weakness and undermines the State Party’s ability to deliver its obligations under the World Heritage Convention. Despite the UK

having been a signatory to the World Heritage Convention for 36 years and World Heritage designation being an integral part of England's heritage protection framework, WHSs still lack statutory recognition. This root and branch review of the planning system should take the opportunity to ensure the designation is properly anchored within primary legislation

It is notable that WHSs have such a low profile generally in the document, being mentioned only late on. They are not mentioned at all in the introductory sections either of the document or this section. Yet they are the nation's premier heritage sites, and reflect a much wider range of heritage than architectural or historic interest. The reasons for the inscription of WHSs vary greatly and include history, religion, culture, industrial development, scientific advancement, botany, landscape and geology/geomorphology. The Government's vision for the planning system should include the conservation of all heritage, and especially the OUV and attributes of WHSs. WH:UK has written separately to the Secretary of State on this matter and set out its case for the statutory recognition of Sites.

WH:UK is concerned that any simplification of policies in the NPPF does not dilute policies in relation to WHSs. WH:UK welcomed the fact that WHSs were given more prominent treatment in the revision of the NPPF in 2018 (carried over to the 2019 NPPF) and is generally content with the policies set out therein. It would request one addition in any revision of the NPPF, which is that the current Chapter 15 should include policies for natural WHSs. At present they are mentioned only as a footnote in Chapter 16, and there are no policies specifically relating to these Sites.

Regarding Proposal 16, which relates to a quicker, simpler framework for assessing environmental impacts, WH:UK made its position clear in its response to question 7(a). In brief, WH:UK agrees that there should not be duplication of effort between appraisals. It supports the use of Environmental Impact Assessments and strongly recommends that Heritage Impact Assessments, following the methodology developed by ICOMOS, should be made statutory for WHSs and their buffer zones/settings.

Proposal 17 gives strong support to the conservation and enhancement of historic buildings and areas. WH:UK welcomes this, the existing strong protections in the NPPF (see above) and the intention for Local Plans to clearly identify World Heritage Sites, to which we would add "their buffer zones/settings". It would have been helpful if the White Paper had then stated how WHSs are to be treated in the new system.

WH:UK notes the assumption that historic buildings will need to be adapted to respond to climate change adaptation and mitigation. This is undoubtedly true in some cases, but in others historic buildings are examples of good energy efficiency by virtue of their design and material use.

Existing development may also need to adapt to climate change, for example development that could help transition communities away from areas at risk from flood or coastal change. Planning should not only recognise these risks as a constraint, it should proactively enable communities to become more sustainable. This is an important consideration in the long-term on the Dorset and East Devon Coast WHS, as well in other Sites.

Also on the issue of climate change, the White Paper rightly focuses on energy efficiency in new-builds and space for 'green' transport options. In addition though, many local authorities and other organisations are developing plans to become net zero in terms of carbon usage. These plans will have transformative impacts on existing settlements, particularly in rural areas, and the planning system will need to help facilitate the processes involved both in terms of new and existing development. Any new planning system should take these issues into account.

WH:UK is uncomfortable with the proposal "architectural specialists can have earned autonomy from listed building consents." The proposal raises a number of questions. How

will an autonomous regime for works to WHSs be achieved? Will there be some oversight, what checks will be made as to the quality of works? How will they then be enforced if the correct standards are not met? How will works be registered and monitored for changes to the historic environment? WH:UK would need satisfactory answers to these questions before it could support this proposal.

### **Pillar Three – Planning for infrastructure and connected places**

#### ***21. When new development happens in your area, what is your priority for what comes with it?***

This will depend on the characteristics of each location and the nature of the development. WHSs generally support environmental and heritage improvements, and improvements to mitigate and adapt to climate change, including sustainable travel and the nearby provision of service infrastructure.

#### ***22(a) to (d) and 23 concern the proposed Infrastructure Levy which will replace s106 and CIL.***

No comment

#### ***24 (a) to (d) concern affordable housing.***

No comment

#### ***25 Should local authorities have fewer restrictions over how they spend the infrastructure levy?***

Local authorities should be free to spend the levy on the needs of their areas, including supporting WHSs and their buffer zones/settings.

#### ***26 concerns the impact of the proposals on people with protected characteristics.***

No comment