

## **Reforming Site Thresholds**

### **Planning Reform Working Paper Response**

#### **Introduction**

Historic England is the government's statutory adviser on all matters relating to the historic environment in England including the marine planning area. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

We welcome the opportunity to respond to this working paper on reforming site thresholds.<sup>1</sup> We have restricted our responses to those questions on which we have a view given potential implications for the historic environment.

#### **Questions**

##### ***Site Thresholds***

*Question 6: Are the proposed streamlining options the right ones for government to consider?*

We do not have a strong view on the principle of site thresholds, although the approach set out seems logical.

However, decisions regarding the historic environment are based on the impact on significance rather than the scale of development. Minor or small-scale developments can, nonetheless, significantly affect a heritage asset and/or the contribution made by its setting. This is important when considering both consultation and submission requirements.

For submission, applications should be accompanied by proportionate supporting information, and it is noted that the National Planning Policy Framework (2024) specifically states "the level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance".<sup>2</sup>

Consultation is also based on the potential impact on significance. For example, the criteria for involving Historic England as a statutory consultee predominantly depends on the possible scale of impact on conservation areas (from larger development), on more highly graded designated heritage assets (Grade I and II\* outside London), and the nature of the proposal (e.g. relevant demolition for grade II listed buildings).<sup>3</sup>

As such, there needs to be a degree of nuance in quantitative gradation for considerations such as the historic environment.

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<sup>1</sup> [MHCLG \(2025\) Planning Reform Working Paper: Reforming Site Thresholds](#)

<sup>2</sup> [National Planning Policy Framework \(2024\) Paragraph 207](#)

<sup>3</sup> [Historic England – When we are consulted – Development Management](#)

## ***Developer Contributions***

*Question 10 What are the specific barriers SMEs face during s.106 agreements and what would be the most effective action for government to take, in line with its manifesto commitments on affordable housing?*

Mechanisms to secure developer contributions are not in themselves barriers and are often key to delivering growth sustainably.

Section 106 agreements are vital tools for securing environmental goals, including care of the historic environment, beyond the quantitative scale of development as the driving factor. They are important in enabling development cases, where additional development is required to meet a conservation deficit, and securing mitigation measures such as archaeological works and restoration.<sup>4</sup> They are also important in providing certainty over phasing of development to ensure environmental improvements are delivered at the appropriate stage.

We are broadly supportive of measures that provide greater certainty to SME developers. As such, there may be merit, to underpin the efficiency of negotiations, to developing model clauses (rather than model templates to ensure appropriate flexibility) on key issues such as those above, subject to consultation with relevant bodies.

## ***Small Sites and Design Codes***

*Question 11: What are the barriers to developing very small sites as defined above and what parameters could be helpfully addressed in a design code? Question 12: What types of rules set out in design codes would be most beneficial in unlocking development?*

The scale of very small sites (under 0.1 hectare) provides a significant opportunity to provide housing and economic growth whilst enhancing the character and vitality of historic places, such as through the sustainable reuse of vacant plots and underused space in buildings.

However, whilst many elements of spatial planning are quantitative, the historic environment, driven by considerations of impacts on significance rather than scale of development, requires a values-based judgement. Similarly, good design, as a related but distinct consideration, relies on understanding a local area, delivered through local plan policy and supported by robust design frameworks. This includes specific policies and guidance for small sites.

Our response to the Brownfield Passports Working Paper highlighted that detailed design parameters were best set and delivered locally.<sup>5</sup> National template codes can, nonetheless, guide local authorities in understanding how they might approach very small sites in their area, but should not in themselves be prescriptive.

Given the ad hoc, rather than definitive, nature of how these sites are likely to come forward, template codes should focus on broader parameters such as scale and composition of

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<sup>4</sup> [Historic England \(2020\) GPA 4 - Enabling Development and Heritage Assets](#)

<sup>5</sup> [Historic England \(2024\) Response to 'Brownfield Passports: Making the Most of Urban Land' Working Paper](#)

development, including the relationship between buildings and spaces, avoiding more granular parameters.

An interesting approach at local level, looking at various relevant development types such as infill and re-developing disused garage sites, is taken in the Lewisham Small Sites Design Guide.<sup>6</sup>

### **Conclusion**

Ultimately, whilst we have no objection to quantitative site thresholds, any changes based on the scale of development should consider where values-based judgments are needed. For the historic environment, decisions depend on the impact on heritage significance, not development scale. Flexibility is crucial for different development sizes, particularly regarding consultation thresholds and submission requirements. Similarly, we support the objective to clarify expectations for very small site development but would emphasise that national policy and guidance should support local authorities in approaching the design of these sites locally rather than setting prescriptive national requirements.

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<sup>6</sup> [Lewisham Small Sites Design Guide](#)