



# Response form

## Streamlining information requirements for planning applications: Consultation

We are seeking your views to the following questions on the proposals to streamline information requirements for outline planning applications, encouraging local authorities to review their local lists taking into account cost burdens, and changes to the standard application form.

### How to respond:

**The closing date for responses is 11 September 2012.**

This response form is saved separately on the DCLG website.

Responses should be sent preferably by email:

Email responses to: [info.requirements@communities.gsi.gov.uk](mailto:info.requirements@communities.gsi.gov.uk)

Written responses to:

Julie Shanahan  
Information Requirements Consultation  
Department for Communities and Local Government  
Planning Directorate  
Zone 1/J3  
Eland House  
Bressenden Place  
London SW1E 5DU

## About you

### i) Your details:

Name:	Charles Wagner
Position:	Head of Planning and Urban Advice
Name of organisation (if applicable):	English Heritage
Address:	1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST
Email:	charles.wagner@english-heritage.org.uk
Telephone number:	020 7973 3826

### ii) Are the views expressed on this consultation an official response from the organisation you represent or your own personal views?

- Organisational response
- Personal views

### iii) Please tick the box which best describes you or your organisation:

- District Council
- Metropolitan district council
- London borough council
- Unitary authority/county council/county borough council
- Parish council
- Community council
- Non-Departmental Public Body (NDPB)
- Planner
- Professional trade association
- Land owner

- Private developer/house builder
- Developer association
- Voluntary sector/charity
- Other

(please comment):	
-------------------	--

**iv) What is your main area of expertise or interest in this work  
(please tick one box)?**

- Chief Executive
- Planner
- Developer
- Surveyor
- Member of professional or trade association
- Councillor
- Planning policy/implementation
- Environmental protection
- Other

(please comment):	
-------------------	--

Would you be happy for us to contact you again in relation to this questionnaire?

Yes  No

## ii) Questions

Please refer to the relevant parts of the consultation document for narrative relating to each question.

### **Question 1: Do you agree with the proposal to remove the national requirement for details of layout to be specified at the outline stage, where layout is ‘reserved’?**

Yes  No

#### Comments

We believe that it is important to retain the requirement for information relating to the scale and layout when the development on the proposal site either directly affects the historic environment because it is on or adjacent to the site, or indirectly as the site is within the setting of heritage assets. This would ensure that there is proper understanding of the impact of the proposals on the historic environment.

In assessing the impact on the historic environment, it is important to know more than just the amounts of development (in area) being applied for. Indicative layout plans show how much of the site is being developed and therefore the potential affect on heritage assets on the site, particularly the archaeology. Some detail of the scale is needed, which if combined with details of layout, allows assessment of the heights of the development over the site. This helps determine if the proposed development is likely have any affect on the settings of nearby heritage assets, in accordance with the NPPF paras 130-9 and 192.

### **Question 2: Do you agree that there should not be a mandatory national requirement to provide details on scale at the outline stage, where scale is ‘reserved’?**

Yes  No

#### Comments

Having layout and scale information at outline planning application stage means that the local authorities are able to determine if there are issues relating to the historic environment that will have to be covered by specific reserved matters rather than having to use reserved matters to cover every eventuality.

Maintaining the requirement for details of layout and scale will have added importance if proposals in the Enterprise and Regulatory Reform Bill to merge conservation area

consent with planning permission go forward. We support this move to remove one extra form of planning consent required alongside planning permission. Allowing permission for demolition of buildings in a conservation area does need to be linked to a planning application for development that does give sufficient information for the existing buildings to be compared to the proposed development, and the effect on the character or appearance of the conservation area to be assessed, as required in the Planning (Listed Buildings & Conservation Areas) Act 1990 Sections 72-75, and in accordance with the NPPF paras 130-9 and 192.

**Question 3: Do you agree with the proposal to retain the national requirement for access points to be indicated in the outline planning application, even where access is ‘reserved’?**

Yes  No

Comments

We agree that the requirement to provide details on the access points to sites should be maintained. Referring back to our previous comments on layout and scale, when there are heritage assets on or adjacent to a site, it is important to gauge whether the construction of access at the points indicated might affect the historic environment, in accordance with NPPF paras 130-9 and 192.

**Question 4: Do you consider that there would be merit in reviewing the content of Design and Access Statements where these are being provided in support of outline applications?**

Yes  No

Comments

We think that there may be some scope for reviewing the content of Design and Access Statements for outline planning permission, provided that the necessary safeguards are retained when the applications affect the historic environment. Good Design and Access Statements are started while initial ideas on the development options for a site are still being determined and help frame those options by highlighting constraints and opportunities. They should be concise and flexible and go on being used and developed until the development is complete. They can be used to explain the principles behind a development in an outline planning application in a way that allows the planning authority to be able to comprehend what the development might look like in an effective way that is far more understandable than indicative drawings and layout

plans which can be more costly to produce.

**Question 5: Are there any additional changes that could be made in respect of outline applications, to further reduce any unnecessary information requirements at that stage?**

Yes  No

Comments

There ought to be a greater requirement for pre-application discussions so as to ensure that the applicant/agent and LPA understand the proposals to ensure that the application as submitted is in the form that both parties understood and with the appropriate amount of information so the LPAs and statutory consultees can assess the proposals in accordance with the NPPF paras 130-9 and 192, to determine if the type of development proposed would promote sustainable development.

**Question 6: Do you agree with the proposal to amend Articles 10 and 29 of the DMPO, to require local planning authorities (if they wish their local information requirements to have an impact on validation) to republish their local lists of information requirements (at least) every two years?**

Yes  No

Comments

We believe that the requirement to have a biennial review process is the key point and if the review does not recommend changes then the local information lists do not need to be republished.

**Question 7: Do you agree that the standard application form should be amended to include reference to agricultural tenants in the ownership certificate?**

Yes  No

Comments

We agree that there is merit in amending the ownership certificate. We would suggest for clarity sake it would be preferable to have a separate question on the ownership form rather than merging the two questions.

**Question 8: Do you agree that the standard application form could be further rationalised?**

**If yes, please suggest components of the standard application form which could be omitted without affecting the ability of the local planning authority to determine the application.**

Yes  No

Comments

We believe it would be helpful if there was a question on the standard application form that asked if there was any designated natural or historic environment on or adjacent to the site. It might just be a box asking if the Local environment record Centre and local Historic Environment Record had been consulted and if anything was recorded on the site.

**Question 9: Are there any further changes that could be made in respect of information requirements for planning applications?**

Yes  No

Comments

**Question: Impact Assessment**

**Do you have any comments on the assumptions and analysis set out**

**in the consultation stage Impact Assessment? (See Annex 3)**

**See also the further specific questions within that Impact Assessment**

Yes  No

Comments

**Thank you for your comments.**



If you require an alternative accessible version of this document (for instance in audio, Braille or large print) please contact our Customer

Services Department:

Telephone: 0870 333 1181

Fax: 01793 414926

Textphone: 0800 015 0516

E-mail: [customers@english-heritage.org.uk](mailto:customers@english-heritage.org.uk)