



Planning Bulletin December 2024

This monthly note highlights some of the recent and forthcoming developments in the world of planning, from a heritage perspective. Please note that this is not necessarily a complete review of matters and is not intended to provide any legal advice on the issues raised. Unless otherwise stated, it does not comprise the formal position of Historic England on these matters.

Legislation and Matters Arising

This section provides a summary of updates to emerging legislation in the last month. Further information on what the emerging legislation covers can now be found in [Appendix I](#).

Emerging Legislation

The Terrorism (Protection of Premises) Bill

- The [Terrorism \(Protection of Premises\) Bill](#) passed the report stage and third reading in the House of Commons on 9 December and first reading in the House of Lords on 10 December. Second reading in the Lords is due on 7 January. On 5 December, the [House of Commons Library published a research briefing on the Bill](#).

Great British Energy Bill

- The [Great British Energy Bill](#) is currently at committee stage, which began on 3 December.

English Devolution White Paper

- On 16 December, MHCLG published the [English Devolution White Paper: Power and partnership: Foundations for growth](#) setting out the Government's plans for devolution across England. The proposals include new powers for Mayors in transport, housing and planning, environment and climate change.

Policy and Guidance

National Planning Policy Framework

- On 12 December, Matthew Pennycook MP, Minister for Housing and Planning, delivered a [Written Statement on Building the homes we need](#). On the same day, MHCLG published the [revised National Planning Policy Framework](#) (NPPF), along with the [Government](#)

[response to the proposed reforms to the National Planning Policy Framework consultation.](#)

- There are no changes to Chapter 16: Conserving and Enhancing the Historic Environment other than changes to paragraph and footnote numbers.
- The revised NPPF includes changes (amongst others) to:
 - the Presumption in Favour of Sustainable Development.
 - requirements to maintain effective cooperation in plan-making.
 - policy on the supply of homes including the removal of references to the Standard Method being an “advisory starting point” and the Urban Uplift.
 - Economic policies including increased support for economic growth and key sectors such as laboratories gigafactories, data centres digital infrastructure, freight and logistics and grid connections.
 - the policy on making efficient use of land as it applies to brownfield sites along with the removal of text that “significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area”. The definition of previously developed land has also been amended to include hardstanding in the glossary.
 - The removal of the word beautiful from the title of Chapter 12 on design.
 - Green Belt policies and the introduction of the concept of both “Grey Belt” and the new “Golden Rules” for housing development in the Green Belt.
 - Increased policy support for renewable energy in and climate change.
- Alongside the revised NPPF, the Government announced a series of other changes and initiatives, these include:
 - An update to the [Planning Policy for traveller sites](#).
 - Additional £14.8m [funding to support local planning authorities with local plan delivery and Green Belt reviews](#). Eligible local planning authorities are invited to submit an Expression of Interest (EOI) form by 17 January.
 - A revised [Housing Delivery Test Measurement Rule Book](#) and the latest [Housing Delivery Test Results](#).
 - [The outcome of the New Standard Method for assessing local housing need](#).
 - A commitment to raise planning fees with regulations in Spring 2025.

Planning Practice Guidance

- There have been consequential changes to Planning Practice Guidance (PPG) following the publication of the revised NPPF. These include:
 - [Plan-making](#): the addition of paragraph 085 covering Local Plan Intervention.
 - [Viability](#): the addition of paragraph 029 covering the Golden Rules for Green Belt development
 - [Housing supply and delivery](#): revisions to paragraphs 001, 002, 004, 009, 013, and 034 to reflect the revised NPPF.
 - [Housing and Economic Needs Assessments](#): updates to paragraphs 001-015 in the Housing Need section to reflect the new Standard Method.
- The Government states within their response to the NPPF consultation that they will make further revisions or introduce new PPGs in future (see Consultation Response Section below for details).

Committees

Built Environment Committee

- The [Built Environment Committee](#), in the House of Lords, has two inquiries open:
 - The [High Street in Towns and Small Cities Inquiry](#) is looking at how high streets can be regenerated and become more resilient and attractive. On 28 November, the Committee published its report, [High Streets: Life beyond retail?](#). A summary of the Report's findings is available on the [Built Environment Committee's Website](#). A response by the Government is due by 28 January.
 - The [Grey Belt Inquiry](#) is looking at what Grey Belt land is, how it can contribute to housing targets and what sustainable Grey Belt development looks like. On 18 December, Angela Raynor and Matthew Pennycook will give oral evidence to the Inquiry. All [oral and written evidence](#) submitted can be viewed online.

Energy Security and Net Zero Committee

- The [Energy Security and Net Zero Committee](#) currently has four inquiries open, including:
 - [Retrofitting homes for net zero](#), which opened on 19 November. The Committee will invite two stakeholder panels to consider the policy changes needed to deliver low carbon heating and energy efficient homes.



- [Unlocking community energy at scale](#), which opened on 11 November. The inquiry will consider, amongst other things, how reforms to the planning system, grid connections and the energy market could support the growth of community energy at scale. The deadline for submission of evidence is 13 January.
- [Workforce planning to deliver clean, secure energy](#), which opened on 11 November. The Inquiry will consider how to build the workforce that is needed to deliver the policies and infrastructure for the UK's clean, secure energy mission. The deadline for submission of evidence is 13 January.

Environment, Food and Rural Affairs Committee

- The [Environment, Food and Rural Affairs Committee](#) has two inquiries open:
 - [Inquiry into the Work of Defra and its arm's length bodies](#), which opened on 6 November.
 - [The future of farming](#), which opened on 6 December.

Environmental Audit Committee

- The [Environmental Audit Committee](#) has five inquiries open, including:
 - [Environmental sustainability and housing growth](#), which opened on 18 November. The Inquiry is seeking views on how the Government's proposed reforms to national planning policy and housebuilding targets might affect environmental protections and current approaches to sustainable development. The terms of reference are available at the [Committee's evidence portal](#).
 - [Governing the marine environment](#), which opened on 16 December. The Inquiry will focus on the UK's environmental obligations under marine treaties and how the UK is delivering on them, as well as the Government's strategy for marine planning and protection in its domestic waters.

Housing, Communities and Local Government Committee

- The [Housing, Communities and Local Government Committee](#) has three inquiries open covering the Funding and Sustainability of Local Government Finance, Rough Sleeping and Children in Temporary Accommodation.

Public Accounts Committee

- The [Public Accounts Committee](#) has 21 inquiries open, including:
 - [HS2: Update following Northern leg cancellation](#), which opened on 31 October.



Government Planning Letters

Letters to Chief Planning Officers

MHCLG regularly writes [letters to Chief Planning Officers](#) of local planning authorities in England, providing guidance on planning.

Planning Newsletter: 13 December

- The [December Planning Newsletter](#) references:
 - The NPPF Update with a summary of changes and other policy changes including a commitment to increase planning fees in Spring 2025.
 - Updated Timetables for Local Plans. The Deputy Prime Minister has asked all LPAs to update their Local Development Schemes (LDS) by 6 March.
 - £14.8m of additional funding to support Local Plan Transition and Green Belt Reviews.
 - Publication of the [Planning Reform Working Paper: Planning Committees](#).

Advice

All [Historic England planning advice](#) is available on our website, and Appendix II includes a list of all Good Practice Advice notes (GPAs) and Historic England Advice Notes (HEANs).

Training

Historic England provide webinars and e-learning courses. Visit [Historic England's training webpages](#) for information and booking, or keep up-to-date on new courses and training news by signing up to receive [Historic England's bi-monthly Training Newsletter](#).

Webinars

Structural Conservation of Ruins - 14 January 2025, 2pm

- Historic ruins differ from historic buildings in ways that can make them challenging even to experienced structural engineers. Bridget Drake-Wilkes, Senior Structural Engineer in the Historic England Structural Engineering Team has recently contributed to The Structural Engineers Conservation Compendium Part 20: Another Life in Ruins which concentrates on the numerical analysis of ruined walls. In this webinar Bridget will present the paper alongside Jon Avent of Mann Williams. Jon authored the first part of the Life in Ruins series in October 2015, as Part 11 of the Conservation Compendium,



which focused more generally on the challenges of derelict structures. To register: https://historicengland.adobeconnect.com/eemroea51cvy/event/event_info.html

Structural Assessment of Historic Assets Proposed for Demolition - 28 January 2025, 1pm

- This webinar covers a new guidance note for structural engineers writing reports and inspecting historic assets that are proposed to be demolished or partially demolished. The note, published recently by CARE (Conservation Accredited Register of Engineers), is intended to provide clear advice to structural engineers who have been asked to report on historic assets when demolition or partial demolition is proposed with the aim of preventing unnecessary loss. To register: https://historicengland.adobeconnect.com/evnffufppyye/event/event_info.html

New On-line Community for Local Authority Heritage Teams

- The Local Authority Heritage Community is a new online learning community for those working in, or with, local authority heritage teams, to start discussions, share resources, and ask questions about planning decisions related to climate change adaptation. Join the discussion at www.khub.net/group/laheritage.

Training Needs Analysis

- Historic England is currently designing its training programme for the next 2 years and wants to refresh its understanding of sector training priorities. Feedback on what the focus of Historic England's training should be is welcome via a short survey. The survey should take around 10 minutes to complete, using this link <https://www.smartsurvey.co.uk/s/XOOYK4/>

Marine Planning

Marine Plan Monitoring

- The Marine Management Organisation conducts monitoring surveys of published marine plans to assess their influence on decision-making. The data supports a three-yearly report to Parliament on the effectiveness of marine plans. The [Marine Plan Monitoring Survey](#) is open now and closes on 27 January.



Other Items

Local Heritage Lists: Historic England Research Survey

- Historic England's Listing team is keen to learn how to support Local Planning Authorities in the creation and management of local heritage lists, and is asking them to complete a short survey:
 - If you **do** have a local heritage list published on your website, please click [here](#) for a form that is likely to take 5-10 minutes to complete.
 - If you **do not** have a full local heritage list, or you have one that is not accessible on your website, please click [here](#). There are only 7 brief questions, so this should not take more than 2 minutes to complete.

New Towns Taskforce: update on membership

- It has been [announced](#) that Lyn Garner has been appointed to the New Towns Taskforce, replacing Eamonn Boylan, ahead of starting his new role as interim Chief Executive of Homes England in January 2025.

High Street Rental Auctions: Non-Statutory Guidance

- On 2 December, MHCLG published [the High street rental auctions: Non-statutory guidance](#) to coincide with the [High Street Rental Auctions Regulations](#) coming into force. The guidance outlines the full application of High Street Rental Auction powers.

Current Consultations

Government Consultations

Planning Reform Working Paper: Planning Committees

- On 9 December, MHCLG published the [Planning Reform Working Paper: Planning Committees](#) inviting views on how the government could reform planning committees to support a plan-led system and ensure appropriate democratic oversight. The paper sets out three proposals:
 - a national scheme of delegation – bringing clarity and consistency to everyone about which applications get decided by officers and which by committees;
 - dedicated committees for strategic development – allowing a dedicated and small group of councillors to dedicate energy to the most significant projects; and



- training for committee members – requiring that councillors undertake appropriate training before they can form part of a planning committee.

Planning Reform Working Paper: Development and Nature Recovery

- On 12 December, MHCLG published the [Planning Reform Working Paper: Development and Nature Recovery](#) inviting views on proposals for a new approach to how housing and infrastructure development can meet its environmental obligations and contribute to nature recovery. The paper sets out three proposals:
 - Moving responsibility for identifying actions to address environmental impacts away from multiple project-specific assessments in an area to a single strategic assessment and delivery plan. This will allow action to address environmental impacts from development to be taken strategically, at an appropriate geographic scale, rather than at the level of an individual project – while recognising the importance of protecting local communities’ access to nature and green space.
 - Moving more responsibility for planning and implementing these strategic actions onto the state, delivered through organisations with the right expertise and with the necessary flexibility to take actions that most effectively deliver positive outcomes for nature.
 - In turn, allowing impacts to be dealt with strategically in exchange for a financial payment that helps fund strategic actions, so development can proceed more quickly. Project-level environmental assessments are then limited only to those harms not dealt with strategically.

Judicial Review and Nationally Significant Infrastructure Projects

- On 28 October, the independent review by Lord Banner KC launched [a call for evidence on Judicial Review and Nationally Significant Infrastructure Projects](#). The call closes on 30 December.

Consultation on draft supplementary Environmental Impact Assessment guidance

- On 30 October, the Offshore Petroleum Regulator for Environment and Decommissioning published [a consultation on draft supplementary EIA guidance for assessing the effects of scope 3 emissions on climate from offshore oil and gas projects](#). The consultation closes on 8 January 2025.



Other Consultations

- On 8 October, Natural England published a [consultation on the Yorkshire Wolds Proposed Area of Outstanding Natural Beauty \(AONB\) Project](#), which proposes to designate a new Yorkshire Wolds AONB. The consultation ends on 13 January 2025.

Government Responses

- On 12 December, the [government published its response to the NPPF](#) consultation. It also provided further details on the future direction of planning reform. The response includes the following:
 - **Design Codes:** the Government will “keep under review the provisions contained in the Levelling Up and Regeneration Act 2023 on authority wide design codes and national policy and guidance on design in relation to how the use of localised design codes and other design tools, including masterplans and design guides, can be embedded as part of the plan-making process.”
 - **Strategic Planning:** “specific wording to address how strategic plans are tested will be considered in a future revision to the National Planning Policy Framework.”
 - **Brownfield Development:** the Government will take into account views received from the [Brownfield Passports – Making the Most of Urban Land](#) consultation “with the intention that any changes to policy will be incorporated as part of future planning changes to deliver a set of national policies for decision making.”
 - **Green Belt / Grey Belt:** further guidance on Green Belt reviews will be published in January, “to ensure a more consistent approach to the identification of grey belt land.”
 - **Local Nature Recovery Strategies:** Planning Practice Guidance on Local Nature Recovery Strategies will be published “as soon as possible in January... This will further clarify the role of Local Nature Recovery Strategies when it comes to enhancing the Green Belt and provide greater certainty for stakeholders when it comes to the role of Local Nature Recovery Strategies in the planning decision making process and the plan-making system.”
 - **Planning Policy for Traveller Sites:** to be reviewed next year in the context of the wider reforms to planning policy.
 - **Viability Planning Practice Guidance:** the Government intends to update the viability PPG in 2025, “to make sure that the viability system works to optimise developer contributions, allowing negotiations only where genuinely necessary.”
 - **Compulsory Purchase:** Government reforms to the compulsory purchase process and compensation rules “will be considered as part of the changes to be made in the



Planning and Infrastructure Bill and will be subject to the consultation process for that Bill.”

- **Renewable and low carbon energy:** Government intends to update the PPG to provide clarity on terminology and the application of policy for renewable and low carbon energy development.
- **Climate Change:** the Government intends to update the PPG “to assist local authorities in considering carbon emissions within the plan-making process, and to support developers in using carbon accounting to reduce carbon emissions as part of their development proposals”.
- **Flood Risk:** the PPG will be updated “to provide greater clarity on how the sequential test should be applied to development in areas of flood risk and to encourage the use of sustainable drainage systems in new development”

Historic England Consultation Responses

- Historic England [responses to recent consultations](#) are available on our website. This includes:
 - [Historic England’s response to the Invest 2035: The UK’s Modern Industrial Strategy consultation.](#)

Calendar

December 2024

30 December - Lord Banner KC’s [a call for evidence on Judicial Review and Nationally Significant Infrastructure Projects](#) closes.

January 2025

8 January - the Offshore Petroleum Regulator for Environment and Decommissioning’s consultation on the [Draft supplementary EIA guidance for assessing the effects of scope 3 emissions on climate from offshore oil and gas projects](#) closes.

13 January - Natural England’s consultation on [Yorkshire Wolds Proposed Area of Outstanding Natural Beauty \(AONB\)](#) closes.

13 January – Deadline for submission of evidence to the [Energy Security and Net Zero Committee’s inquiry on Unlocking community energy at scale.](#)

13 January – Deadline for submission of evidence to the [Energy Security and Net Zero Committee’s inquiry on Workforce planning to deliver clean, secure energy.](#)



Historic England

14 January – Historic England Webinar: [Structural Conservation of Ruins](#). 2pm.

17 January – Deadline for expressions of interest for [funding to support local planning authorities with local plan delivery and Green Belt reviews](#).

27 January – Deadline for completion of MMO's [Marine Plan Monitoring Survey](#).

28 January – Historic England Webinar: [Structural Assessment of Historic Assets Proposed for Demolition](#). 1pm.

Planning Bulletin Notifications

If you did not receive this edition of Planning Bulletin direct from Historic England, you can sign up for notifications when a new edition is issued by emailing: governmentadvice@HistoricEngland.org.uk

If you no longer wish to receive Planning Bulletin, or have received this in error, please email governmentadvice@HistoricEngland.org.uk and we will remove you from the mailing list.



Appendix I: Progress of Emerging Legislation

Government Bills

The [King's Speech](#) (17 July) introduced 40 bills, including the **Planning and Infrastructure Bill**. More information on the proposed contents of these and other bills can be found in the [King's Speech 2024: background briefing notes](#) (summarised below).

Planning and Infrastructure Bill

- The [Planning and Infrastructure Bill](#), not yet laid before Parliament, proposes to:
 - Streamline the delivery process for critical infrastructure, including simplifying the consenting process for major infrastructure projects.
 - Enable relevant, new, and improved National Policy Statements to come forward, establishing a review process that provides the opportunity for them to be updated every five years.
 - Further reform compulsory purchase compensation rules to ensure that compensation paid to landowners is fair but not excessive where important social and physical infrastructure and affordable housing are being delivered.
 - Improve local planning decision making by modernising planning committees.
 - Increase local planning authorities' capacity, to improve performance and decision making, providing a more predictable service to developers and investors.
 - Use development to fund nature recovery where currently both are stalled.

Great British Energy Bill

- The [Great British Energy Bill](#) establishes Great British Energy, a new, publicly owned energy production company which will own, manage, and operate clean power projects.

Holocaust Memorial Bill

- The [Holocaust Memorial Bill](#) was carried over from the previous Parliamentary session and has already passed the House of Commons and its first reading in the House of Lords. The Bill will enable the Government to deliver on a long-term commitment to build a Holocaust Memorial and Learning Centre next to the Houses of Parliament by allocating funding and removing restrictions on development in Victoria Tower Gardens.



High Speed Rail (Manchester to Crewe) Bill

- The [High Speed Rail \(Manchester to Crewe\) Bill](#) was carried over from the previous Parliamentary session. The Bill enables powers to deliver rail infrastructure in the north of England.

Crown Estate Bill

- The [Crown Estate Bill](#) seeks to change aspects of how the Crown Estate operates including widening investment powers and granting the power to borrow. This will support delivery of offshore energy, as the Crown Estate is the owner of the seabed, as well as regeneration and housebuilding given its extensive property portfolio.

Terrorism (Protection of Premises) Bill

- The [Terrorism \(Protection of Premises\) Bill](#) require persons with control of certain premises or events to take steps to reduce the vulnerability of the premises or event to, and the risk of physical harm to individuals arising from, acts of terrorism; to confer related functions on the Security Industry Authority; to limit the disclosure of information about licensed premises that is likely to be useful to a person committing or preparing an act of terrorism; and for connected purposes. On 3 September, DESNZ published the [Great British Energy Bill Overarching Factsheet](#). The House of Commons Library has also published on 3 September a [Research Briefing on the Great British Energy Bill](#).

Private Members Bills

Environmental Targets (Public Authorities) Bill

- The [Environmental Targets \(Public Authorities\) Bill](#) makes provision for a statutory objective requiring public bodies to contribute to delivery of targets set under the Environment Act 2021 and Climate Change Act 2008; to place a duty on public bodies to meet this objective in the exercise of their functions; and for connected purposes. The Bill started in the House of Lords and is sponsored by Lord Krebs.

Permitted Development Rights (Extension) Bill

- The [Permitted Development Rights \(Extension\) Bill](#) makes provision to extend permitted development rights to allow householders to improve and extend their residential properties; and for connected purposes. The Bill started in the House of Lords and is sponsored by Lord Lucas.



Appendix II: Historic England Planning Advice

Good Practice Advice Notes (GPAs)

The GPAs provide information on good practice, particularly looking at the principles of how national planning policy and guidance can be applied. They are the result of collaborative working with the heritage and property sectors in the [Historic Environment Forum](#), and have been prepared following public consultation:

- [GPA1: The Historic Environment in Local Plans \(March 2015\)](#)
- [GPA2: Managing Significance in Decision-Taking in the Historic Environment \(March 2015\)](#)
- [GPA3: The Setting of Heritage Assets \(December 2017\)](#)
- [GPA4: Enabling Development and Heritage Assets \(June 2020\)](#)

Historic England Advice Notes (HEANs)

The HEANs include detailed, practical advice on how to implement national planning policy and guidance. They have been prepared by Historic England following public consultation:

- [HEAN 1: Conservation Areas: Designation, Appraisal and Review \(Second Edition\) \(February 2019\)](#)
- [HEAN 2: Making Changes to Heritage Assets \(February 2016\)](#)
- [HEAN 3: The Historic Environment and Site Allocations in Local Plans \(October 2015\)](#)
- [HEAN 4: Tall Buildings \(Second Edition\) \(March 2022\)](#)
- [HEAN 5: Setting up a Listed Building Heritage Partnership Agreement \(November 2015\)](#)
- [HEAN 6: Drawing up a Local Listed Building Consent Order \(November 2015\)](#)
- [HEAN 7: Local Heritage Listing \(Second edition\) \(January 2021\)](#)
- [HEAN 8: Sustainability Appraisal and Strategic Environmental Assessment \(December 2016\)](#)
- [HEAN 9: The Adaptive Reuse of Traditional Farm Buildings \(October 2017\)](#)
- [HEAN 10: Listed Buildings and Curtilage \(February 2018\)](#)



Historic England

- [HEAN 11: Neighbourhood Planning and the Historic Environment \(Second Edition\) \(April 2022\)](#)
- [HEAN 12: Statements of Heritage Significance \(October 2019\)](#)
- [HEAN 13: Minerals Extraction and Archaeology \(January 2020\)](#)
- HEAN 14 has been superseded by HEAN 18 and has been withdrawn
- [HEAN 15: Commercial Renewable Energy Development and the Historic Environment \(February 2021\)](#)
- [HEAN 16: Listed Building Consent \(June 2021\)](#)
- [HEAN 17: Planning and Archaeology \(November 2022\)](#)
- [HEAN 18: Adapting Historic Buildings for Energy and Carbon Efficiency \(July 2024\)](#)