

Written evidence submitted by the National Trust (PEG0250)

With our staff, members, volunteers and supporters, the National Trust is the biggest conservation charity in Europe. We protect and care for places so people and nature can thrive. Many millions share the belief that nature, beauty and history are for everyone. So we look after the nation's coastline, historic sites, countryside and green spaces, ensuring everyone benefits. For everyone, for ever.

Introduction and summary

1. The coronavirus pandemic continues to be one of the most significant challenges we've faced in a generation. Covid 19 has changed the world forever, but the world still faces the same huge challenges it did before the pandemic. Threats from climate change and the depletion of our nature and biodiversity remain as immediate and severe as ever. As governments consider the longer-term future, we need to make sure approaches to recovery contribute to the response not only to this pandemic, but to these wider crises.
2. The National Trust would like to respond to the challenges of the past several months by helping to lay the groundwork for a brighter future, which addresses the inequalities of access to green space and to beauty, heritage and culture that we have witnessed throughout the crisis, and supports the recovery of our sectors and our communities.
3. As such, we believe government policy must seek to renew as well as recover. The goal should not be to return to the pre-pandemic status quo, but instead use this moment to move forward, learn from past recoveries, including the financial crisis, and put ourselves in a better position to tackle the challenges that the future will bring, with a legacy that benefits people now and in the future. This submission sets out the National Trust's view of where the UK Government can most effectively invest get the best outcomes for people, nature and the economy alike. There are five key points that we make:
 - Lockdown has reminded us how important nature and green space is to people – and how unequal access to it is. Urban green space research shows a £5.5BN investment in green infrastructure could unlock huge economic benefits and tackle these inequalities.
 - Restoring nature must be at the core of efforts to tackle climate change, grow resilience and support people's health and wellbeing. The UK Government's ambition as set out in the 25 Year Environment Plan is good, but the task of building the regulatory and legislative frameworks to support it when we leave the EU is incomplete. Government must put in place a world leading system of environmental protection and ambitious targets for the restoration of nature enforced by a strong, independent regulator and based on accessible environmental law and principles, and a land use and farming system that delivers for nature and the climate.
 - While energy and transport are pivotal for the UK's net zero ambition, recovery measures should encourage other sectors such as farming, culture, heritage, tourism and construction to deliver greater public benefit, contribute to reducing emissions and increase long term sustainability as part of recovering their financial security. Green infrastructure should be

prioritised and other infrastructure, where it is necessary, should make a positive contribution, and not come at the cost of the environment.

- We should be seeking to make the most of our heritage, both as a fundamental element of our built environment, and a key contributor to the UK's tourism sector. Making the best possible use of our historic buildings can retain embodied carbon and reduce emissions, support regeneration of towns, cities and high streets, generate tourism and local economic activity, and offer spaces for shared cultural experience.
 - Enabling local decision making and an ability to respond to varying local needs will be key. Any changes to the planning system should contribute to enhancing quality and distinctiveness of place, and not weaken important protection for nature and heritage.
4. In our view the UK Government's announcements so far fail to meet the scale of ambition needed to tackle the nature and climate crises. With the Prime Minister also proposing radical changes to the planning system in England, which currently acts as a key safeguard for heritage and nature, we question how the Government's actions are living up to their promises about building back greener.

Overarching Green Recovery Principles

5. Long-term recovery cannot be about short term economic growth alone. The goal should be a recovery that builds social, cultural and natural capital, drives a low carbon transition, and delivers climate resilience and mitigation alongside economic gain. Sustainable economic activity and job creation that meets the needs of the future should be the aim.
6. The pandemic has not impacted everyone equally, and those living in lower quality environments, without access to nature or culture have been particularly affected. Our recovery should leave a legacy of more high quality, locally distinct places where everyone can enjoy nature-rich, green spaces on their doorstep, access to local heritage and shared cultural spaces that help bring communities together. This means a recovery that:
- Delivers social and environmental recovery as well as economic growth, to enhance the health and wellbeing of individuals, communities and the UK as a whole; and
 - Addresses inequalities of access to green space and to beauty and history.
7. To ensure this is delivered, we would like to see all projects supported as part of any fiscal stimulus package by all governments in the UK meet the following tests:
- 1. Environmental Improvement:** every project must be compatible with the overall aspiration to improve nature and create an environmentally resilient economy.
 - 2. Net Zero:** every project or industry that benefits from public money must be compatible with or further our net zero emissions responsibilities.
 - 3. Net Gain:** any infrastructure delivery projects—public or private—that receive public money as part of a fiscal stimulus should be required to achieve net gain for biodiversity.

Measures and stimulus

Maximising outcomes of public investment to support Green Recovery

8. Delivering a truly green recovery that benefits everyone isn't something that can be done through a single set of measures, or through a narrow focus on a small number of sectors. A range of policy and funding mechanisms must work together to deliver a coherent, holistic package of measures that support public benefit. Investing in green energy and transport will be pivotal for the UK's net zero ambition, but we would also like to see recovery measures support other sectors such as farming, culture, heritage, tourism and construction to deliver greater public benefit, contribute to reducing emissions and increase long term sustainability as part of recovering their financial security.
9. This will require cross-sector and cross-government investment and policy intervention to deliver a coherent, holistic package of measures with flexibility to meet local needs. The success of much public investment will depend on the health of the sectors who deliver work on the ground – which includes private sector, but also third sector and public sector organisations. Many of these organisations have suffered severe losses to income in recent months as a result of the coronavirus, and will face long term limitations in what they can deliver, with reduced budgets and staff resource. There is therefore a need for a rewired and more sustainable future funding landscape to support our sectors in the wake of the coronavirus lockdown - in order to rebuild capacity, and grow the right skills and capability to deliver the recovery we need.
10. The current overall funding landscape is unlikely to support this holistic goal. It is challenging for key stakeholders (local and national governments, local delivery partners, businesses, landowners, and communities) to take a strategic approach which responds to local need where funding mechanisms are fragmented across different sectors, and often focus on short term outcomes rather than sustainable structural changes and enhancements which provide long term public benefit. New thinking on the strategic join up of funding is therefore needed.
11. Innovative approaches to the use and pooling of funding could be one way to support this effort. Consolidated funding, that brings together public and private sources in new investment models, would create opportunities to deliver bigger, more strategic outcomes and multiple benefits. As well as existing funds such as lottery funds, research councils, landfill, designated funds and funds arising from planning obligations such as Section 106 agreements, the UK Government has launched, or has plans to launch, the Shared Prosperity Fund, the Cultural Investment Fund, the Future High Streets Fund, and the Cycling and Walking Fund. In addition, those funds that focus on nature (such as the Nature for Climate Fund and funding to arise from the biodiversity net gain measures in the Environment Bill) can potentially play a part, and in doing so help ensure a holistic approach to sustainable recovery, and the long term future of organisations in a range of sectors, who will be at the forefront of much of the delivery on the ground.
12. We'd also like to see government explore innovative fiscal measures and models which bring together public and private funding and create new investment models and opportunities to provide sustainable sources of funding over the long term. This could include exploring the role of green and blue bonds, and ways of blending public and private money. We believe public funds should have an explicit aim of encouraging private sector investment so that the green recovery can be sustained without always needing to resort to fresh injections of public funding through grants.

13. In making decisions about where to direct public funding for stimulus and recovery measures, government should be looking to deliver co-benefits across sectors, and investment in our natural and built environments is often particularly well placed to deliver this, with significant potential for longevity and breadth of impact. For example, the Tourism Sector Deal was developed and put into place in a vastly different context to that which is currently faced by the sector, which directly contributes around £48 billion to the economy every year, and supports 1.4 million jobs. The sector will need support above and beyond that already set out in that deal, and within the context of green recovery there is much that we discuss in this submission which would benefit both the tourism industry and help deliver for the environment and climate. Investment in green infrastructure and support for public and green transport options will help people reach visitor attractions more sustainably; and measures to promote the reuse and restoration of historic buildings to maintain embodied carbon (for e.g through cutting VAT on buildings maintenance) will contribute to the quality of our historic villages, towns and cities. Enhancing the natural environment and enriching our wildlife and landscapes, and the access that people have to them, will also widen the UK's visitor offer – with new outdoor places to explore expanding capacity and taking the pressure off those which are suffering from high visitor numbers.
14. Covid 19 has brought changes to the way that we live and work, and this will also mean many individuals and communities now have different long term needs and priorities in terms of infrastructure. It is likely for example, that more people will choose to continue to work from home in future, and to take holidays in the UK. We should be seeking to capitalise on positive changes which can help us tackle challenges such as climate change, and enhance our health and wellbeing, rather than simply seek to return to the assumptions and priorities of our pre-covid world. Investing in grey infrastructure such as new road building should only take place where absolutely necessary, and where it can be shown to contribute towards the UK reaching net zero emissions. Major infrastructure projects should also be held to the requirement to deliver biodiversity net gain.

Placing nature and greenspace at the heart of our recovery

Urban greenspace

15. The coronavirus crisis has highlighted the very real difference to people's lives that access to green space and nature can bring. Easy access to quality green space has become an essential need for urban dwellers, and during lockdown, as people sought to find ways to stay active and entertained, there was a huge surge in people's use of parks and green spaces - up 25 per cent this May compared to May 2018. Some inner-city parks have experienced a close to 300 per cent increase in visits this spring, and the National Trust has experienced unprecedented visitor numbers to its urban fringe sites.
16. Nearly two-thirds of people also say that they have appreciated local greenspaces more due to Covid-19 and that they want them to be a higher priority for government priority. These spaces offered the opportunity for people to be outdoors during their daily exercise, and having somewhere safe, beautiful and rich in nature near to their homes has been extremely valuable to those lucky enough to have it.

17. But not everyone has been able to benefit from access to green space during this crisis. Covid19 has exposed deep inequalities in access to green space. New research published recently by Vivid Economics and Barton Willmore, commissioned by the National Trust and partners found:¹
- 295 deprived neighbourhoods had no trees or accessible green space, affecting 440,000 people;
 - In areas where over 40 per cent of residents are from ethnic minorities, there is 11 times less public green space than in areas where residents are largely white. The green space that does exist is also likely to be of poorer quality. Meanwhile, black people are four times less likely than white people to have a private garden.
 - Black and Asian people visit natural settings 60 per cent less than white people (despite evidence that these communities value parks more than their white counterparts).
 - In the poorest 20 per cent of households, 46 per cent don't have a car, and so rural beauty spots are likely beyond their reach. Urban parks and green spaces are their only opportunity to have contact with nature.
18. This research mapped the most deprived and greyest areas of Great Britain and assessed the costs and benefits of three major interventions to level up access to quality green spaces. The interventions that the research looked at included:
- Greening urban streets and neighbourhoods, creating street parks and connecting-up local green spaces to enable safe and attractive walking and cycling;
 - Upgrading poor quality parks and green spaces with more trees and wildlife, cycling routes, and with facilities for communities to significantly boost recreation, play and sport.
 - Creating large regional parks and forests in the urban fringe, on green belt land, connected into the city, to enable people to explore and play in wild natural spaces without needing a car.
19. It found that there is a powerful economic case for significant investment across the UK in greening the country's most left behind and greyest urban communities over the next five years. A £5.5 billion commitment to an urban green infrastructure fund as part of the Government's recovery stimulus could potentially bring an impressive £200 billion in physical health benefits through disease prevention and mental wellbeing benefits to alleviate some of the strain on local health service providers and to improve people's quality of life. This is comparable in scale and ambition to the very welcome infrastructure investment in active and sustainable travel and highly complementary in achieving a positive impact and legacy. Over 20 million people would directly feel the benefit from this investment - nearly a third of the UK population. It would also support wider job creation, particularly in those areas of the country facing high levels of unemployment, with an estimated 40,000 jobs in initial construction and over 6,000 created permanently for ongoing maintenance.
20. Greening neighbourhoods, towns and cities at scale could bring a host of wider benefits to people's lives - improved air quality, reduced summer temperatures and surface flooding, and facilitating cycling and walking options. Many of these benefits will be vital to helping make cities and towns resilient to climate change, and greening measures can work in support

¹ <http://www.bartonwillmore.co.uk/BartonWillmore/media/Main/news/news/2020/Greenkeeper/Greenkeeper-Report-for-FPA-Greening-Programme-July-2020-2.pdf>

initiatives to tackle issues such as flooding, and contribute to delivering on the Government's recent flood policy statement and the Environment Agency's new flood strategy, for example.

21. Urban green infrastructure can directly contribute towards achieving net zero emissions, and the scale of investment we propose could deliver one in 12 of the UK's tree planting target. Research on London's green spaces showed for every £1 Councils spent on looking after parks, £27 in value was generated for people across these various benefits.²
22. Finally, investing in green urban spaces and making it easier to access these places also has the potential to benefit people's health and deliver savings to the NHS. For example, a natural capital study at Minnowburn in Northern Ireland identified its most significant benefit to be its contribution to people's health and wellbeing. With over 145,000 visits per year, many of these visits met the required standards of intensity and duration of physical activity required for quality adjusted life years. In this way, these active visits combined to deliver estimated annual savings of over £1.8 million to the NHS.³

Investing in nature and land use change

23. Investments in nature and land use change can provide significant economic benefit, while the ongoing decline of nature and ecosystems can result in significant economic costs (although often these are not properly internalised and therefore go unaddressed). But the Interim Report of the Dasgupta Review has concluded that investments in nature pay, on average, a 19-fold return – far higher than many conventional forms of investment. Several reports have been published in recent months demonstrating that investment in a green recovery (including nature conservation and restoration as well as low-carbon technology) can generate significant numbers of jobs. For example, a report by IPPR concludes that a green recovery could create up to 1.6 million jobs, offsetting a large proportion of those that may be lost through any economic downturn.
24. The restoration of nature and healthy ecosystems provide a wide range of benefits, from reduced flood risk to increased carbon storage. Figures from the Office for National Statistics show that the UK's natural capital can be valued at almost £1 trillion; the cooling and shading effect of trees was worth £248 million in 2017 alone; the value of being within 500m of a green or blue space for UK households was £78 billion in 2017 and also in 2017 the removal of pollutants by trees saved an estimated £1.3 billion in health costs (and this reinforces our comments above regarding the value of urban green space in particular, which is where most people live).
25. The Government has demonstrated that it understands the importance of investing in nature, including through the establishment of a new Nature for Climate Fund and new money for Natural Flood Management. £40 million of funding was brought forward early as a Green Recovery Challenge Fund. However, nature conservation organisations have recently highlighted the need for at least £350 million of funding so as existing projects can go ahead, before the need to deliver additional projects that leverage up ambition and results. The Government plans to create 500,000 hectares of new habitat through a Nature Recovery

² https://www.london.gov.uk/sites/default/files/11015viv_natural_capital_account_for_london_v7_full_vis.pdf

³ Natural Capital Solutions, *Natural Capital Assessment in Northern Ireland: Urban Study*, April 2018, <https://www.nienvironmentlink.org/cmsfiles/NI-urban-natural-capital-study---FINAL-2.pdf>

Network and to introduce legally binding environmental targets. All of these are welcome steps to chart a course for the restoration of nature, but will require financial investment. The RSPB's 2019 Emergency Plan for Nature estimated that £9 billion per year are needed for nature restoration as part of £42 billion per year investment in the environment – a step change on the current levels of public spending on environmental outcomes.

26. A mix of financial flows will be needed to restore nature, from public money, to nature conservation organisations to private finance mechanisms. The Government's investment through the Nature for Climate Fund will play an important role in driving the restoration of peatlands and increased tree cover. However, it is limited to trees and peat, without considering the significant potential of other ecosystems such as mudflats, seagrass and natural or semi-natural grasslands to store and sequester carbon. Additionally, we understand that the vast majority of the Fund will be used for trees, while 35,000 hectares of peat will be restored. In England's uplands alone there are 355,000 hectares of peat, the majority of which are in a degraded state. 35,000 hectares is a promising start and we hope that the Government will go much further in investing in the restoration of England's peatlands.
27. Analysis done by National Trust, The Wildlife Trusts and the RSPB shows that up to £2.3 billion need to be invested in environmental land management (through a new agricultural system), but that these costs could be outweighed 2.7 to 1 by the estimated environmental benefits. The existing Common Agricultural Policy has driven most public subsidy into intensive farming practices. A new agricultural system based on rewarding farmers for delivery of environmental outcomes will produce public benefits by restoring nature and ecosystems at the same time as the production of food continues. This new system will be crucial to help declining farmland bird species, and also to shift the economics of some types of production in favour of more sustainable practices. For example, in the lowlands arable production, horticulture and grazing all occur on peat soils. England's lowland peatlands account for the vast majority of emissions from peatlands. The drainage and ongoing use of these peat soils is causing them to erode rapidly. Instead they need to be used sustainably or returned to a natural wet state for part or all of the year. A new farming system could support more environmentally sustainable practices, such as paludiculture (wetland farming) that provides benefits to nature and the climate.
28. In addition to public spending, private finance can play an important role in funding the restoration of nature - on its own, or (as discussed above) blended with public money,. The National Trust has worked with Green Alliance to develop National Infrastructure Schemes, auctions which allow farmers or land managers to sell (individually or in groups) the environmental benefits provided by their land management practices to private beneficiaries – for instance, selling reduced flood risk through re-naturalised rivers and tree planting to private companies (energy utilities) that benefit from reduced flood risk. Public funding can help to provide match funding from the private sector, to regulate through the enforcement of the polluter pays principle to ensure that environmental harm is deterred in the first place or to trial private market models. Government can also provide green impact bonds, which allow private individuals to invest in a scheme, with the Government paying a rate of interest in return for a recognised public goods outcome, such as improved ecosystem services or enhanced natural capital.
29. However, financial investment in the natural environment will be undermined if it is not accompanied by strong legal safeguards in order to protect and restore the environment. The

Government is proposing to bring forwards and Environment Bill, with legally binding targets, environmental principles, and a new environmental watchdog. However, the environmental principles will be contained within a policy statement, rather than on the face of the Bill itself, and Government will control the funding and appointments to the new Office for Environmental Protection, undermining its independence. Strong legal environmental frameworks are essential for upholding the environmental law and ensuring that targets are met, and these measures need to be in place across all nations of the UK. We are concerned about the prospect of a governance gap emerging and encourage collaboration between governments to put robust governance frameworks and targets in place.

Making best use of our heritage

30. Addressing the energy efficiency of domestic buildings will be a vital part of delivering on the Government's net zero ambition, and we believe this needs to be acted on as soon as possible. Investing in upgrading and retrofitting homes as part would bring significant long term social and environmental benefits, and enable us to make the very best use of our buildings while creating warmer, more sustainable homes for everyone.
31. The English Housing Survey indicates that around 22% of the total housing stock in England was built before 1919 (known as 'traditional' buildings), and these constitute around 35% of privately rented homes: a significant proportion therefore of homes in England.
32. There is a strong case for protecting traditional buildings. They bring substantial economic and social benefits, contributing to the regeneration of high streets and towns, promoting individual wellbeing, and forming a backbone of the visitor economy.⁴ The buildings provide beauty and enhancing the character and distinctiveness of the places where people live, and offer a physical reminder of our shared past. There is also significant opportunity in terms of decarbonising. Recent research by Historic England also shows that embodied carbon (i.e. that generated through construction, use, maintenance, demolition or reuse) is significantly underestimated in calculations of the carbon footprint of new buildings.⁵ When you consider the whole life of a building, the relative carbon footprint of a historic building can compare favourably against the alternative of demolition and new build. In terms of contributing to net zero by 2050, Historic England found that:

"When a typical historic building – the Victorian Terrace – is sympathetically refurbished and retrofitted, it will emit less carbon by 2050 than a new building. But only if the whole life carbon of the building is considered"
33. The same research also identified substantial potential for improvements in energy efficiency in traditional buildings, finding that it could be possible to reduce emissions by up to 60% through sympathetic refurbishment and retrofit. And there are many technologies now available that offer solutions that can work in some traditional homes – air and ground source heat pumps for example, both of which we have experience of installing in our estate. However, the financial investment required to deliver such increases to efficiency is very significant, and in the wake

⁴ See for example Historic England "Heritage Counts" reports on economy and society - <https://historicengland.org.uk/research/heritage-counts/>

⁵ Historic England, "There's no place like old homes", Feb 2020, <https://historicengland.org.uk/content/heritage-counts/pub/2019/hc2019-re-use-recycle-to-reduce-carbon/>

of the coronavirus pandemic, where many heritage bodies are reeling from significant financial losses, there is a risk that these costs could be prohibitive.

34. The Clean Growth Strategy contains the ambition to ‘develop a long-term trajectory to improve the energy performance standards of privately rented homes, with the aim of upgrading as many as possible to EPC Band C by 2030 where practical, cost-effective and affordable’. Whilst we support the overall ambition set out in the Clean Growth Strategy we have significant concerns about the use of EPC banding, both in terms of its accuracy (particularly when applied to traditional buildings) and its application as a measure to drive down greenhouse gasses as we head towards a low carbon future (the Committee may be interested in our recent submission to the Environmental Audit Committee, which sets out these concerns in more detail). Significant reform to the EPC process is required to make it fit for purpose.
35. Our significant concerns about EPCs notwithstanding, a strict target of EPC Band C for all private rented properties (including traditional buildings) would require more complex measures (such as low carbon heat sources) to be installed as standard, which is likely to be prohibitively expensive for many landlords.⁶ Our modelling shows an investment of approximately £98 million would be required by the National Trust to bring all our properties to Band C level using appropriate energy efficiency measures and low carbon energy sources. In addition to short term installation costs there can be additional ongoing fuel (particularly if using biofuels or electric heating) and maintenance costs.
36. The availability of public funding to support the capital and operational costs will in some cases be the only way that such significant changes can be delivered. Most National Trust property is held inalienably, which means that we are unable to sell it – but being unable to let a property would make their maintenance much more difficult, and remove vital, good quality housing from the reach of people who need it. However, for other landlords, sale or demolition in favour of new build may be a tempting alternative – which would not only put heritage assets at risk, but likely result in greater overall carbon dioxide emissions in the long run, once the whole life costs of demolition and rebuild are taken into account. The recently introduced changes to Permitted Development Rights to allow demolition and rebuild without full planning consent for many buildings may increase the likelihood of this outcome for traditional buildings which are not listed or within conservation areas.
37. The Chancellor recently announced a £3bn package for energy efficiency, £2bn of which will support private owners in retrofitting homes with vouchers worth up to £5000. This is a really welcome first step towards delivering on their manifesto commitments, and starting the nation on the path towards net zero. Further details are awaited on what this scheme will cover, and while we welcome the investment being made, there is a risk that if it is implemented in a blanket way, pushing measures such as double glazing, exterior cladding, or solid wall insulation, without recognising the need for traditional buildings to be treated appropriately, it could be extremely damaging for that 22% of our housing stock. If owners are not given the right advice, and are pushed towards operators without the right skills then this scheme could do more harm than good – both for the building and for the people who live there.

⁶ Though we would draw the Committee’s attention to our previously articulated concerns about the accuracy of EPCs and their ability to support decarbonisation as a specific goal.

38. The availability of advice and the ability to undertake installations and retrofits in traditional buildings relies on the health of the heritage building sector, which is under severe pressure.⁷ A specific plan is therefore needed for the rollout of appropriate measures for traditional and historic buildings, to build skills and capability to make our traditional building stock ready for our low carbon future. There is a significant lack of knowledge and skills to deliver high quality and successful installations to traditional builds on this scale, which limits the practical delivery of appropriate improvement measures – and in the context of the package just announced, this makes the risk that unskilled operators undertake inappropriate work more likely.
39. One straight forward measure that the Government should take is to reduce the VAT on housing repair, maintenance and restoration, which is currently set at 20%. This compares to the zero-rated VAT that currently applies to new build construction, which only increases the incentive to demolish and rebuild, rather than make improvements to existing buildings. This measure was supported by the recent Building Better Building Beautiful Commission, and could have multiple economic benefits in terms of encouraging spending on repair and retrofit, which benefits the construction and wider heritage sector. With the right investment, historic building retrofit could be an area of growth in the UK, providing new jobs and driving innovation in the heritage sector, where we could seek to be a world leader.

Industrial Strategy and local growth

40. Existing sector deals arising from the Industrial Strategy may need revision in light of Covid. For example, the Tourism Sector Deal was developed and put into place in a vastly different context to that which is currently faced by the sector, which directly contributes around £48 billion to the economy every year, and supports 1.4 million jobs. The sector will need support above and beyond that already set out in that deal, and within the context of green recovery there is much that we have already discussed in this submission which would benefit both the tourism industry and help deliver for the environment and climate. Investment in green infrastructure and support for public and green transport options will help people reach visitor attractions more sustainably; and measures to promote the reuse and restoration of historic buildings to maintain embodied carbon (for e.g through cutting VAT on buildings maintenance) will contribute to the quality of our historic villages, towns and cities. Enhancing the natural environment and enriching our wildlife and landscapes, and the access that people have to them, will also benefit tourists.
41. Translating ambition into action on the ground will be a key challenge in delivering a recovery, and not everything can be driven by central government alone. There needs to be flexibility to meet local need and for communities to have a say: while centrally managed funds and investment have a place, different places will have different social and economic priorities, and opportunities in terms of recovery. Metro Mayors and other local leaders need the resources and know-how to deliver transformational change that can deliver sustainable growth with positive outcomes for local economies, communities and the environment. For example, they need to be empowered to enhance the quality, extent and connectivity of their green spaces in and around their cities, particularly in areas of social, economic and environmental deprivation. This is about providing adequate resource and funding, and also ensuring the structures are in place to make best use of it to deliver the changes and outcomes we've discussed in this

⁷ 40% of smaller crafts-based businesses and professional services (architects/surveyors/engineers) forecast business failure within 3 months, according to Historic England

submission. For example, the introduction of mandatory Green Infrastructure Standards could help level up those areas which are most poorly served at present, and provide a clear base line for Mayors and local authorities to invest in and work towards.

42. The long-awaited UK Shared Prosperity Fund (UKSPF) should provide an important source of funding to support local growth, though at present there is no information about how funds will be allocated across the UK, or how grant decisions will be made. Given the impact of Covid-19 and the potential for this to be amplified by Brexit we would like the UK Government to provide more information about their plans for the UKSPF as a matter of urgency.
43. The ability of Local Enterprise Partnerships (LEPs) in England to invest in SMEs and rural businesses is a concern, if they are to be administering the UKSPF grants as currently expected. As discussed, a wide range of sectors, such as farming, culture, heritage, tourism and traditional crafts and construction could all deliver greater public benefit, generate jobs and contribute to reducing emissions and increase long term sustainability as part of recovering their financial security. However, focusing on what is easily measurable, such as on levels of productivity, has been the past approach of many LEPs. This has led them towards big energy, and road infrastructure, rather than engaging with more complex SME based economies such as tourism and agriculture where the benefits more dispersed but can be critical in terms of places and people's lives.
44. Local Industrial Strategies (LISs) in England could provide a vehicle to set out a strategy for local economic recovery that takes this holistic approach, and focuses on job creation and economic activity through the approaches we've described in this submission: investing in nature and green infrastructure, addressing inequality of access to green space, nature based climate mitigation and appropriate adaptations in the build environment, and regeneration and revival of historic town centres and heritage assets – without taking a one-size fits all policy that may leave some places at a disadvantage. Those LISs already in development or agreed before coronavirus may need revising to reflect the changed context.
45. It's also particularly important that any changes to the planning system should contribute to enhancing quality and distinctiveness of place, and not undermine important protection for local nature and heritage, or the ability of local people to participate in the planning process. We should not underestimate the role that the planning system and planners can play in creating a legacy of high quality, locally distinct places that provide access to nature, history and beauty where people need it most.
46. The Government has recently announced a number of changes to the planning system in England, including changes to Permitted Development Rights which will be coming into effect very shortly. We are concerned about some of these immediate changes and their ability to contribute positively to the recovery the country needs. Upward development and demolition and rebuild both create risks to heritage, landscape and setting, this could result in poor quality outcomes for people, where size, space standards, access to green space, community and placemaking are not given adequate consideration.
47. Permitted Development rights for changes of use carry a risk of unintended consequences, particularly in rural settlements with limited shops, and in town and city high streets, which the Government has sought to revitalise and already significantly invested in through schemes like the High Streets Fund and Heritage Action Zones. These measures take decisions away from

the conventional planning system, but the requirement for prior notification means that the burden on Local Authorities is still substantial. We see very minimal gains therefore in terms of reducing bureaucracy, but real risks to communities' ability to influence the development and changes to the built environment that impact them.

48. We are also concerned about the Government's longer-term proposals for significant reform of the planning system, as outlined in the recent Planning White Paper. Our country has vibrant towns and communities because of a plan-led approach, not in spite of it, yet we continue to face the challenge of chronic under resourcing in local planning authorities, slowing down effective decision making.
49. There is much detail still to follow in terms of how the Government sees its "simplified" zoning system working and this will be crucial: the effectiveness of this type of system relies on the regulation, guidance and standards that sit around it. However, we feel that broad-brush approaches to development and general de-regulation are very unlikely to deliver places that are sustainable, beautiful, integrated and liveable, where everyone can enjoy nature-rich, green spaces on their doorstep, access to local heritage and shared cultural experiences. We see a real risk that the system will fail to make full use of the skills of planners, reduce the ability of the public to input into decisions about development in their communities, and generate low quality, poorly joined up and nature-poor piecemeal development.
50. Changes could be made to our planning system which enable places to better meet the needs of their communities – whether that be housing, green space or making the best use of local heritage. We will suggest these to the Government in response to their consultation. However, it is important to stress that all changes to the planning system need to be carefully considered in the context of how we build back better, not just faster.

September 2020