

## Making Music's response to UK Government open consultation on **Proposed reforms to the National Planning Policy Framework and other changes to the planning system**

Making Music is the UK association for leisure-time music, with 4,000 music groups in membership, comprising around 240,000 hobby musicians. Our members include vocal groups (54%), instrumental groups (36%) and volunteer promoters (10%). These can be any genre, size or purpose, ranging from small ukulele groups playing for wellbeing to choral societies of 150+ singing at the BBC Proms. Music groups are generally small charities run by volunteers and typically undertake weekly activity (e.g. rehearsals) approximately 40-45 weeks a year in buildings they hire, e.g. churches/church halls, school/educational establishment halls, village or community halls, arts centres, local authority spaces etc.

Chapter 8 – Delivering community needs

### **Question 67**

#### **Do you agree with the changes proposed to paragraph 100 of the existing NPPF?**

(Significant weight should be placed on the importance of facilitating new, expanded, or upgraded public service infrastructure when considering proposals for development.)

We agree that public service infrastructure should be prioritised in planning.

Providing the essential public service infrastructure for the new communities created by increased housing can have a secondary impact on other activity in communities, such as culture and recreation. We know that 21% of the 4,000 Making Music members (leisure-time music groups) use education buildings – schools, FE colleges etc - for making, rehearsing and performing music, and this is only one possible use of education buildings out of teaching time. Building schools and colleges with flexible spaces available for community letting can help ensure new communities are provided with activity for leisure and wellbeing as well as statutory services.

Expanding or upgrading existing infrastructure could mean the creation of community hubs to replace out of date school buildings, buildings that include libraries, health facilities and those crucially important flexible spaces, available to let for a wide range of community activity including music making. FE colleges and schools can make other facilities available for community use depending on their specialisms – performance spaces, recording studios, rehearsal rooms – providing local people with resources that can contribute to healthy communities.

Understanding schools and FE colleges as available space for wider community activity needs to be considered by developers and architects. Ensuring these new and renovated buildings have flexible spaces fit for school/college purposes but that could also be fit for other purposes e.g. orchestral concerts may require additional consideration in design and build. Adopting a place-making approach, that enables healthy communities means investing from stage 1 to ensure spaces are useful (e.g. acoustically appropriate) and used.

## Q 69

### **Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?**

(Challenging the default assumption of automatic traffic growth, where places are designed for a ‘worst case’ peak hour scenario, can drive better outcomes for residents and the environment. It means working with residents, local planning authorities and developers to set a vision for how we want places to be, and designing the transport and behavioural interventions to help us achieve this vision. This approach is known as ‘vision-led’ transport planning and, unlike the traditional ‘predict and provide’ approach, it focuses on the outcomes desired, and planning for achieving them.)

We agree with the adoption of a ‘vision-led’ approach to transport planning, with one of the desired outcomes to be enabling people to access leisure time activities by public transport. The country needs to move from a position where public transport is generally less available in the evening and at weekends – the times when people come together to make and listen to live music, just one of a huge range of leisure activities that require people to assemble in specific place at a specific time. We regularly hear from members of the impossibility of using public transport to attend rehearsals and performances, even in towns and city centres, because services are too few, don’t reach suburban areas, or stop too early. If transport planning is to be led by the vision of healthy and economically strong communities, it must take account of activity that takes place after 6pm.

The importance of the night-time economy to towns and cities is undisputed, and the volunteer led, non-professional music groups that are our members contribute to that – performing and promoting typically between 2 and 12 concerts each group each year. Less obvious are the weekly rehearsals, workshops and meetings that lead up to these events, most of which take place on week-day evenings, usually finishing after 9pm. If live music is to be nurtured in all communities, the public transport infrastructure needs to be available, reliable and affordable on both weekday and weekend evenings. We acknowledge that the use of services at these times will be lower in comparison to daytime, but without a decent standard of public transport later into the evening, people will either choose not to take part in activities or use cars only for travel.

We also acknowledge that a number of our members’ participants and audiences will always need to use cars. Those with a disability that affects mobility cannot easily move onto public transport, so continuing to provide vehicle access and an appropriate number of bays for disabled parking at or near venues and community spaces is essential. Currently the plans to restrict cars in some towns and cities are not coinciding with improved public transport so it is becoming unaffordably expensive to bring a car into a rehearsal or performance venue, with no alternative option.

## Question 70

## How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

### a) promoting healthy communities

The membership of Making Music are leisure-time music groups – volunteer-led groups of hobby musicians who make, rehearse and perform music, or who promote concert series and festivals in their communities. Our 4,000 members are in communities in every part of the UK, and we think we represent about 1/3 of all such groups (based on the only available data - Our Creative Talent, 2008 study by Arts Council England and the Department for Culture Media and Sport) – meaning there are an estimated 13,800 self-governed volunteer-run music groups in this country. Research tells us there are many and varied health benefits of music making, and listening to live music, for anyone who participates and increasing for those that do so regularly. [Arts-and-population-health-FINAL-March-2023.pdf \(sbbresearch.org\)](#)

We are pleased that the existing and proposed National Planning Policy Framework recognises cultural activity and the spaces it takes place in as an important part of a healthy community. We welcome the retention of Paragraph 97 (existing – 95 proposed), which specifically references cultural buildings as an example of one of the “the social, recreational and cultural facilities and services the community needs”. Importantly this paragraph also references ‘shared spaces’ and ‘community facilities’. From surveys of our members, we know that flexible shared community spaces are much more important on a regular (e.g. weekly basis) to leisure-time music groups than concert halls and music venues.

The three types of spaces music groups meet in most regularly (i.e. for rehearsals rather than performances) are

- churches/ church halls (54%)
- schools/ other educational establishments (21%)
- community or village halls (15%)

These are used by 90% of our member groups.

Top 5 types of spaces music groups stage performances (and other public events) in most regularly are

- churches/ church halls (62%)
- open air (8%)
- cultural venue (not Local Authority run, e.g. theatre, arts centre) (7%)
- community or village hall (6%)
- local authority venue (6%)

We are therefore particularly concerned about threats to this community level infrastructure, and our campaign [#MakeSpaceForMusic](#) highlights and works to address these increasing challenges. Threats include:

- High utility costs – Community Matters reported in 2023 that a third of the community spaces had an increase in utility costs of 60% or higher. This resulted in nearly 20% reducing the availability of their community space.
- Church closures – There is a trend of closures across the UK: the [National Churches Trust](#) reports the number of churches open falling from 42,000 to 39,800 in ten years.
- Heavier regulation – Village, community and church halls are often managed by volunteers. The numbers of people engaged in volunteering are falling (evidenced in the [Community Life Survey](#)) while the responsibilities volunteers have to take on increase, such as those proposed in the draft Terrorism (Protection of Premises) legislation.
- Local authority budget constraints – Since 2022, Community Leisure UK have been reporting that Culture Trusts are at ‘crisis point’ with buildings closures inevitable. News of closures of local authority owned buildings - [Cleckheaton Town Hall owned by Kirklees Council](#) in September 2024 – come more and more regularly as LAs seek to balance the books.

Government and local authorities should be aware of the crucial role that church buildings play in communities – for music making and performance amongst a huge range of activity including the provision of essential services such as childcare and public health. National planning policy should consider how to replace churches as they fall out of use as public spaces, or how they can be retained for community use e.g. by introducing new “right to buy” for community assets. For new communities, what space will need to be built when a church will not be taking up the role of providing space for general community activities?

To protect and plan for the necessary building infrastructure for healthy communities, the National Planning Policy Framework could be more explicit about what is expected. For example:

Paragraph 96 (existing – new 94): c) references places that ‘enable and support healthy lifestyles’ but does not reference leisure and recreation activities other than sport and active travel. It would be useful to have creative leisure activities such as singing, dancing etc recognised here as an example of other types of activity that have benefits for health and wellbeing.

Paragraph 97 (existing - new 95): a) uses the phrase ‘plan positively for’, which does not suggest that planners are under an obligation, whereas d) and e) use the word ‘ensure’. Could a) also be phrased as such? i.e. “Ensure the provision and use of shared spaces, community facilities ...”

Also Paragraph 97 (existing - new 95): c) ‘guard against the unnecessary loss’ does not suggest an obligation to act. This in comparison to wording of Paragraph 103 (existing – new 101) which states “Existing open space, sports and recreational buildings and land, including playing fields, **should not be built on**” We are concerned that this suggests there are less

protections required of general social, recreational and cultural facilities than of specific sports facilities.

In the Paragraphs covering Open space and recreation, 103 (existing – new 101) and 104 (existing – new 102), there are strong protections for “Access to a network of high quality open spaces and opportunities for sport and physical activity”. We would argue that physical activity such as singing, dancing, playing wind and brass instruments provide equal benefits for physical health, but these are not necessarily recognisable as the ‘sport and recreation’ activity that is clearly referred to in these paragraphs. Clarification that the word ‘recreation’ could cover physical activity that would not be recognised as sport, but that also confers physical health benefits would provide valuable protections for buildings used for music, such as Brass Band halls.

The National Planning Policy Framework clearly recognises the required infrastructure of accessible community buildings that needs to be made available for low cost hire, so leisure activity such as music making that has benefits for health and wellbeing can flourish. Our concern is that the protections and obligations are not articulated in policy strongly enough. As local authority budgets are unable to stretch to the maintenance or development of community spaces, local authorities will continue to close, not replace and certainly not develop this essential infrastructure. Some strong intervention is required.

Further information from:

Making Music

[Making Music | Helping leisure-time music flourish](#)

[alison@makingmusic.org.uk](mailto:alison@makingmusic.org.uk)

020 7939 6030

Making Music is the trading name of the National Federation of Music Societies, a company limited by guarantee registered in England and Wales no. 308632. Registered Charity in England and Wales no. 249219 and in Scotland no. SC038849.