Guide to Heritage in Neighbourhood Plans

National Trust

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Foreword

Neighbourhood planning and heritage guidance

Local communities have an opportunity through neighbourhood planning to create a vision for the future of their area, by agreeing what is special and how character can be preserved or enhanced and by enabling appropriate and sustainable new development.

Heritage – both built and natural – defines the character of the places where people live and underpins the quality of life and work. The National Trust believes that an effective planning system guides well-designed, necessary development in the right places, making an important contribution to prosperity and growth. At the same time, it can prevent development that is poorly designed or in the wrong place. Good planning delivers the new homes, shops, employment and services that communities want, where they want them, and it protects the places that matter to us all, forever, for everyone.

The National Trust is guardian of many special places and understands the role of heritage in supporting local communities and economies. This doesn't just mean our protected heritage and designated landscapes but also the everyday heritage that matters to communities and the green spaces that they value.

We commissioned this guidance to help communities take a lead in the planning of historic areas by identifying and safeguarding the local heritage that supports the places where they live, work and spend their leisure time.

We are very pleased that it has been endorsed by Locality and the Institute of Historic Building Conservation, whose members and supporters like us would like to help empower and enable local communities to care for their heritage whilst embracing sympathetic change.

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1 | Introduction

1.1 Purpose of this guide

This document describes how heritage can be incorporated into neighbourhood plans. This includes guidance on evidence, stakeholder engagement, statutory process and planning for heritage (including policies). The guide is aimed at anyone involved in neighbourhood planning or with an interest in planning and heritage.

Neighbourhood plans are prepared by parish or town councils or, in unparished areas, neighbourhood forums made up of people who live or work in the area and elected members. Neighbourhood plans, once made, form part of the statutory development plan for the area.

Heritage can help to achieve a wide range of social, economic and environmental goals. So it is important that it forms an integral part of the wider planning of an area. Heritage can help to deliver sustainable growth. At the same time, planning for growth can support an area's heritage and help to make it more viable.

The role of heritage in delivering sustainable and inclusive economic development is often misunderstood. Tourism and the visitor economy are important parts of this. However, heritage has a much wider economic role, especially in helping commercial and industrial areas to adapt to modern needs, supporting physical and economic regeneration and in supporting business and enterprise.

So neighbourhood plans provide a real opportunity to plan for heritage as part of the wider planning of the neighbourhood area.

2 | Heritage policy and designations

2.1 National policy for heritage

The National Planning Policy Framework 2019 includes specific policy on conserving and enhancing the historic environment. Paragraph 185 is of particular importance:

> 'Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:
>
> a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
>
> b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
>
> c) the desirability of new development making a positive contribution to local character and distinctiveness; and
>
> d) opportunities to draw on the contribution made by the historic environment to the character of a place'.

In preparing a neighbourhood plan, it is important to consider not just the specific section on historic environment, but all policies that have implications for heritage, for example policies on town centres, economy, Local Green Space, housing and design.

The Government's Planning Practice Guidance contains further advice. This is available here: **www.gov.uk/government/ collections/planning-practice-guidance**

Against the context of national policy and guidance, neighbourhood plans can include policies that set out specific requirements for development with regard to impacts on heritage, for example use or design policies. In addition, site allocations, Local Green Space designations and other measures can be used to guide where new development can take place.

2.2 Heritage designations

Conservation areas

The legal definition of a conservation area is an 'area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance'. Conservation areas are designated at local level by local planning authorities. They provide protection against demolition and introduce other controls, such as reduction of permitted development rights and protection for trees.

Conservation area designations may be accompanied by Article 4 Directions. Article 4 Directions provide more rigorous protection, for example on things like replacement of doors, windows and shopfronts or on painting of masonry walls.

When considering development proposals affecting conservation areas, there is a special statutory duty on local planning authorities: 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'[1].

Listed buildings

The legal definition of listed buildings is 'buildings of special architectural or historic interest'. The statutory list is administered at national level. Most listed buildings are Grade II. A small proportion of buildings of particular importance are listed Grade II* and an even smaller proportion Grade I.

There is a special statutory duty on local planning authorities: 'In considering whether to grant planning permission for development which affects a listed building or its setting… shall have special regard to the desirability of preserving the building or its setting or of any features of special architectural or historic interest which it possesses'[2].

Scheduled monuments

Scheduled monuments (known previously as scheduled ancient monuments) are designated[3] at national level and consents are administered nationally too, by Historic England. Scheduling is a stronger and less flexible form of protection than listing. Virtually all works to scheduled monuments need consent. The impact of development on a scheduled monument or its setting would be a material consideration in planning decisions.

World heritage sites

World heritage sites are designated at international level by UNESCO[4]. World heritage site status is a material consideration in planning decisions. More substantive protection is provided by a combination of conservation area, listed building and scheduled monument designations.

Historic parks and gardens register

The Register of Historic Parks and Gardens is compiled at national level. Inclusion on the register is a material consideration in planning decisions. However, more effective protection is often provided by them being designated as conservation areas or through structures having listed building status.

Battlefields

A register of historic battlefields is administered by Historic England. Inclusion on the register would be a material consideration in planning decisions.

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[1] Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990
[2] Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990
[3] The Ancient Monuments and Archaeological Areas Act 1979
[4] United Nations Educational, Scientific and Cultural Organisation

2.3 Undesignated heritage

Local lists

Many local authorities have compiled lists of buildings and other heritage assets of local interest. The impact of development on a local interest buildings or structures would be a material consideration in planning decisions. However, there is no protection over demolition unless a building is within a conservation area or, more unusually, demolition is controlled by an Article 4 Direction.

Archaeology

Local historic environment records identify undesignated archaeological areas or structures. These are a material consideration in planning decisions.

2.4 Natural environment and landscape designations

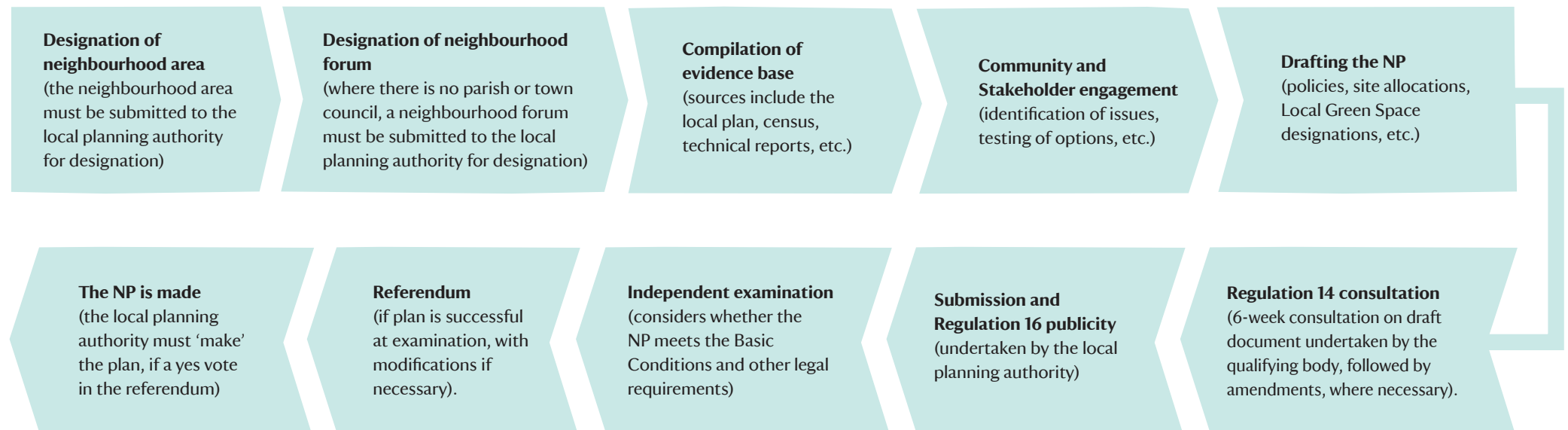There is a wide range of natural environment and landscape designations that may be relevant to heritage assets and their settings. These can include Tree Preservation Orders, Areas of Outstanding National Beauty, Sites of Special Scientific Interest, European nature conservation sites, Nature Reserves and numerous other designations. The local planning authority should be able to provide details of all such designations.

3 | Neighbourhood plan process

3.1 Statutory process

A brief overview of key stages of the neighbourhood plan process is as follows:

Designation of neighbourhood area
(the neighbourhood area must be submitted to the local planning authority for designation)

Designation of neighbourhood forum
(where there is no parish or town council, a neighbourhood forum must be submitted to the local planning authority for designation)

Compilation of evidence base
(sources include the local plan, census, technical reports, etc.)

Community and Stakeholder engagement
(identification of issues, testing of options, etc.)

Drafting the NP
(policies, site allocations, Local Green Space designations, etc.)

The NP is made
(the local planning authority must 'make' the plan, if a yes vote in the referendum)

Referendum
(if plan is successful at examination, with modifications if necessary).

Independent examination
(considers whether the NP meets the Basic Conditions and other legal requirements)

Submission and Regulation 16 publicity
(undertaken by the local planning authority)

Regulation 14 consultation
(6-week consultation on draft document undertaken by the qualifying body, followed by amendments, where necessary).

More comprehensive guidance on the neighbourhood plan process is given by the Locality Neighbourhood Planning Roadmap Guide (2018 edition).

4 | The evidence base

4.1 Evidence based neighbourhood plans

As with local plans, neighbourhood plan policies must be evidence-based. The evidence base for heritage will include some data specific to heritage and some data of wider relevance to the plan. So in practice the heritage evidence base forms part of the wider neighbourhood plan evidence base.

Matters of particular relevance to heritage are set out below.

4.2 The nature of the heritage resource

The extent and nature of heritage assets in the area should be identified. This includes the number of listed buildings (categorised by grade), conservation areas, scheduled monuments and other heritage designations. Heritage assets of particular significance should be highlighted.

A brief overview of the historical development of the area will be useful, but should be concise. Any concentrations of a particular kind of heritage asset should also be highlighted, for example industrial heritage or distinctive building types or structures.

The local planning authority should be able to help, including making available details of conservation areas within the neighbourhood area, character appraisals, details of locally listed buildings and providing access to the historic environment record, which includes details of archaeological sites, monuments and buildings. Details of listed buildings may be viewed through the Historic England website.

4.3 Values of heritage

An essential part of the heritage evidence base is in understanding how historic buildings and areas are used by the public, businesses, organisations and other stakeholders and how they support the local economy and community. This is about identifying the economic, social, community, environmental and other values of heritage. The following gives some idea of different values of heritage assets.

Productive, economic use

Heritage has a range of social, economic, environmental and cultural values. Most historic places and buildings have utility value and are in productive use, from large urban commercial buildings to small rural cottages. This can include commercial space, residential accommodation, agricultural storage, community and recreational uses, to name but a few. For some owners, property investment is the motive for taking on historic properties. The range of uses of heritage assets, including predominant uses, should be identified.

Regeneration and enterprise

Historic places can form a basis for sometimes dramatic physical and economic transformations, especially in areas that have experienced commercial or industrial decline. They can provide flexible and affordable floor space, essential for supporting new small businesses and enterprise. Rural and agricultural buildings can support diversification. Historic environments can help to project a positive image and attract investment, jobs, population and visitors to an area, from city centres to villages. Regeneration initiatives or the potential of the area and of key sites should be recognised.

City, town and village centres

High-quality historic environments help to attract shoppers and visitors, creating competitive advantage for town and city centres. In rural areas, villages with high-quality historic environments can be a 'honeypot', attracting people to visit shops, pubs and cafés. Historic places tend to have higher proportions of independent businesses and specialist shops, supporting choice and diversity. The distinctive offer of retail centres should be assessed.

Tourism

Historic places and buildings help to give different places their own identity and distinctive character. This is key to attracting tourists and visitors, supporting a range of local businesses. Tourism is a significant part of the local economy in many urban and rural areas. The contribution of the historic environment to attracting visitors should be described, supported by numerical data where available.

Skilled employment

The maintenance and repair of historic buildings creates skilled employment (professional, technical, skilled manual and vocational), including craft-based jobs. Building refurbishment generates higher levels of pay and investment in local urban and rural economies. Although outside of the scope of neighbourhood plan policy, it is useful to identify local skilled contractors, or lack of them.

Sustainable use of resources

Conservation of historic buildings and places avoids the use of scarce resources associated with demolition and redevelopment. Historic buildings are often durable and adaptable. Historic places often have high-density building patterns and were designed for a low-carbon economy in terms of movement and activity patterns.

4.4 Local uses

4.5 Viability

Older areas tend to support mixed use, with more facilities in easy walking distance. It's really important to assess the historic environment in terms of sustainable characteristics, to ensure that such characteristics can be reinforced by policies.

Housing: Historic buildings can add to the variety, choice and quality of housing in an area, from well-established terraced streets and rural cottages to new apartments in converted mills and factories. Equally, identifying opportunities for new housing in and around centres, or opportunities for building conversions, can be an effective way of enhancing their viability and supporting local businesses and community facilities, including shops.

This list is not comprehensive and the various cultural, economic, community, and environmental values of heritage will need to be assessed on an area-by-area basis.

It is important to understand how heritage is used and how it supports different social, economic, recreational and other activities and functions. Heritage is a working part of the infrastructure of towns, cities and rural areas. Some neighbourhood areas will have a wide mix of uses, whilst others may have more predominant land uses.

Use trends should be identified, for example where changes of use have occurred. For example, some commercial or industrial areas may have diversified, following a period of decline. Agricultural buildings and complexes may have fallen into disuse and then supported new residential accommodation or business enterprises.

The number of empty buildings in an area is an important indicator, and may be a sign of wider economic problems. The reason for vacancies should be identified. Often this will be indicative of wider changes in the urban or rural economy of an area.

Understanding of the property and land economy in an area is crucial to assessing the viability of heritage assets. There may be big differences in the viability of properties in different parts of an urban area, between urban and rural areas or between different towns and villages.

Viability is about comparing the projected returns from investment in buildings, compared to the costs involved. If there is no prospect of achieving a reasonable return in a realistic time frame, then investment is unlikely to happen.

High levels of vacancy and poor condition of properties, including those in occupation, can be a strong indicator of weakness or failure in the local land and property economy. To understand this, it will be necessary to look at local socio-economic data, including the performance of the land and property economy, population profile, and local economic trends.

In looking at feasibility of projects, economic viability is a key factor. Other factors can include infrastructure capacity or deficiencies, environmental constraints, neighbouring uses, the local policy context, and numerous other factors.

4.6 Design and character analysis

Analysis of the existing built environment provides a basis for drafting policies, including policies on design and character. A starting point is the analysis of townscape characteristics, including enclosure and definition of streets and urban public spaces. Green spaces and trees, hedges and natural features can also be important to character.

Analysis of character and of special architectural or historic interest can also include analysis of phases of growth, building technology and construction, associations with different planning and architectural movements, materials, associations with people and events, scarcity and completeness and other factors. It is really important to differentiate between polite architecture and local vernacular buildings. Vernacular buildings were a practical and functional response to limited budgets and limited transportation, so used available local materials and related construction techniques. Polite architecture is designed by architects (usually) and demonstrates aesthetic and other principles in its design, often reflecting wider national and international influences. The distinctive character of many historic places is based on both vernacular buildings and polite architecture, so local and national and international influences. A common mistake is to focus on local vernacular only.

In rural areas, defining character includes analysis of settlement patterns and the landscape setting of villages and other settlements.

Urban design analysis also includes assessing uses, movement and the ways in which an area functions. This provides an essential basis for planning change and development in historic places.

Annex 1 provides more guidance on design and character analysis.

4.7 Sustainability analysis

Urban design analysis often identifies that historic areas have superior characteristics in terms of sustainable layouts, mixed use, concentrations of community facilities, pedestrian permeability and other characteristics.

More advice on sustainability analysis is contained at Annex 2.

4.8 Local issues

Significant local issues should be identified in terms of the use, adaptation and long-term conservation of heritage buildings and places. These could include things like:

Alterations

Changes to properties can harm the special interest of buildings and places. This could include things like replacement of original doors and windows, loss of chimneys and other features, and painting of masonry or concrete. These may be due to inadequate protection (for example conservation areas with no Article 4 Direction). Or there may be issues with inadequate enforcement where alterations are unauthorised.

Vacancy and condition

The condition of properties, levels of maintenance and extent of disuse or underuse can all be indicators of local economic conditions, as discussed previously. Heritage strategies and policies must take account of local economic circumstances. Heritage-led regeneration may be part of the way of addressing underlying economic weaknesses.

Traffic

Considerable harm can be caused by traffic. For example, high levels of congestion can make places unattractive as places to live or work. Physical damage to historic fabric can be caused by pollution, vibration and physical impact. Uncoordinated traffic signage can contribute to street clutter. Car parking can dominate public squares and spaces. At the same time, it is essential that historic places be well served by transport, including having adequate parking and sustainable transport options. Historic urban centres tend to be served by public transport, though this is more variable for rural settlements.

Public realm

The quality of the public realm (streets, public spaces, paths and other public areas) is a key factor in creating places that can attract investment, visitors and shoppers. So a poor-quality public realm is not just harmful to local character, it is an impediment to economic success. Initiatives to regenerate towns and cities often include early initiatives to improve streets and public spaces, as this can help to create investor confidence. Streets and public spaces also affect the performance of businesses around them, for example by providing space for social interactions or supporting pedestrian movement.

Infrastructure

A key factor in considering feasibility of reuse and regeneration of historic assets is consideration of supporting infrastructure in the area. This can include public transport links, highway access, good pedestrian links and other transport infrastructure. It can also include community infrastructure, like access to shops, medical facilities and community centres. Green infrastructure is important too, such as parks, open spaces and pathways. Infrastructure deficiencies should be identified, especially where they are an impediment to reusing historic buildings.

These are just a few common issues. Each neighbourhood area will have its own set of issues to address and these should be highlighted by analysis of evidence, surveys of the area and the outcomes of community engagement.

4.9 Some useful tools

Useful tools for helping in surveying an area include:

Building for Life 12

This is a methodology developed by the Design Council for analysing housing areas or proposed housing developments in terms of design, sustainability and community considerations. This can be downloaded from the Design Council website. Whilst focused on housing, it can also be a useful checklist in assessing commercial and other kinds of areas.

Placecheck

This was developed by the Urban Design Group and is now available through the Historic England website. Place check is a method of analysing local places, based on what is good, what is bad and what changes are needed. It was developed for analysis of the built environment, but can be adapted easily to consider also social and economic factors.

Neighbourhood planning Local Green Spaces toolkit

This toolkit was published by Locality and includes templates to support analysis of green space for Local Green Space designation. It is available through the **neighbourhoodplanning.org** website.

Neighbourhood Plans: Regeneration toolkit

Also developed by Locality, this toolkit includes numerous regeneration scenarios, including advice on historic areas. The document includes a tool for considering pedestrian permeability around town, village and local centres.

Appendix 1 and 2 to this document include tools on 'Townscape, Design and Character Analysis' and 'Sustainability Analysis'.

5 | Community and stakeholder engagement

5.1 Need for engagement

Community and stakeholder engagement is an important element of all stages of the neighbourhood plan process. As with the evidence base, engagement on heritage matters should form an integral part of wider engagement for the neighbourhood plan so that heritage is addressed as part of wider social, economic and environmental planning.

Heritage assets may provide a means to address some of the wider issues identified through community and stakeholder engagement, for example by accommodating new enterprise space or residential accommodation.

There are formal statutory stages of publicity and engagement, including publicity for neighbourhood area and neighbourhood forum applications, pre-submission consultation on the draft plan (Regulation 14), publicity of a submitted plan (Regulation 16), publicity of proposed modifications to a plan and publicity of the referendum.

5.2 Who to engage

Early stakeholder and community engagement can identify key issues with heritage, such as challenges in making heritage assets work against the context of the local property economy. Later engagement can involve local people and stakeholders in looking at options and finding solutions.

In addition to engaging with the wider community, key stakeholders should be identified and this could include local amenity groups, civic societies, business organisations, community organisations and significant land and property owners.

For many owners, the motivation for taking on a heritage property is to use or occupy it, for example as a home, business premises or recreational facility. Many commercial owners will take on historic properties as an investment. The heritage value may not even be a factor to a prospective purchaser. So it is particularly important to gain understanding of the diverse perspectives of owners of heritage buildings and estates.

Especially where there are viability challenges in making heritage-led schemes work, local stakeholders, including community organisations, may be the key to realising the aims of the neighbourhood plan. So it is useful to assess local capacity in the third or community sector to take on heritage assets and projects.

6 | The basic conditions and heritage

6.1 The basic conditions

Neighbourhood plans must meet specified basic conditions and other legal requirements and these are tested through the independent examination.

The four basic conditions are summarised as follows:
• helping to achieve sustainable development
• having regard to national policy and guidance
• being in general conformity with strategic local policies
• not breaching EU obligations.

Neighbourhood plans must also comply with human rights law.

6.2 Achieving sustainable development

Neighbourhood plans must deliver growth, but must also take account of the interests of future generations. Consideration of sustainability has economic, social and environmental dimensions.

The sustainability values of historic buildings and areas have been discussed previously, including providing permeable environments for pedestrians. Heritage-led regeneration and economic development can have very different characteristics to growth based on comprehensive redevelopment, especially in providing a greater variety of floorspace, including affordable space. This can be useful in meeting the diverse needs of the local population.

6.3 Regard to national policy and guidance

Neighbourhood plan policies must have regard to national policy and guidance, including the National Planning Policy Framework 2019 (NPPF) and the Government's Planning Practice Guidance. This relates not just to the sections specifically on heritage, but to all of the advice relevant to heritage, which is likely to include a wide range of subjects, from employment and housing to design and transport.

A neighbourhood plan must have regard to national policy, but should not repeat actual policy. Rather it should seek to apply or interpret national policy for the specific local area.

6.4 General conformity with strategic local policies

As with national policy and guidance, strategic local policies must be considered, including heritage-specific policies, but also the wider range of relevant policies. Neighbourhood plan policies should not repeat local plan policies. These already apply and repeating them causes confusion.

General conformity is considered for the entire neighbourhood plan, so there is some scope for modifying or departing from older local plan policies where national policy or an emerging local plan or more recent evidence contradicts those policies.

6.5 EU obligations

Neighbourhood plans must be screened by the local planning authority to determine whether strategic environmental assessment is required. A judgment will be made on whether the plan would have significant environmental impact (positive or negative). Impacts on heritage would be considered. There is a statutory requirement to consult Historic England and other bodies as part of the screening process. Habitats Regulations Assessment may also be required, if there are European sites in or around the area.

Following Brexit, an equivalent of these requirements may be introduced.

7 | Writing the plan

7.1 Understanding heritage

Heritage protection legislation is based on a judgment that historic buildings and places are a public good, of value to the wider community, so should be conserved for the benefit of current and future generations.

The roots of the modern conservation movement lie in the 19th century. In particular, there was a reaction against genuinely historic structures being 'restored' to what was imagined to be a more original state (conjectural restoration). This led to the establishment of the Society for the Protection of Ancient Buildings (SPAB). SPAB principles are still very influential today, especially in principles like conservative repair, works being reversible and new works being expressed in a modern way.

Change is a common factor of historic areas. Change created cherished historic environments and change is an essential part of conservation. Indeed, historic buildings and areas can actually be a focus for change, especially where their original functions have declined, for example due to changes in commerce, industry or agriculture. Conservation is about careful management of change.

The term used in planning legislation to define historic buildings and areas is 'special architectural or historic interest'. Planning policy also refers to 'significance', which reflects and encompasses various factors that can contribute to 'special interest'.

Conservation practice involves managing and maintaining places and buildings, and planning for their future. Heritage has cultural values associated with the past, but is also part of the infrastructure of modern society and a fundamental resource that underpins its sustainable future. Therefore, heritage is an economic resource in the present, with social, economic and environmental values.

The challenge is to conserve cultural values whilst allowing places and buildings to adapt where appropriate or necessary, so that they remain fit for purpose, accommodating society's changing needs and demands.

Consequently, heritage practice is fundamentally about reconciling values, by addressing heritage values in the context of utility values, investment values, economic values, social values, environmental values, legislative requirements and the other requirements of those that occupy and use heritage.

To make good-quality judgments regarding potential changes to heritage, it is essential to consider the impacts of those changes against a wide social, economic and environmental context. Focusing only on heritage significance can lead to poor-quality and unsustainable decisions because it considers only a small part of a complex process. In some instances this can result in heritage assets becoming non-viable, threatening their survival.

Fundamental to all of this is the recognition that change created our historic environments and that change is an essential part of managing and developing those environments.

7.2 Planning for heritage

Balancing values of heritage

Planning for heritage should be an integral part of wider social, economic and environmental planning. For that reason, neighbourhood plans with a narrow focus on heritage significance are unlikely to be effective or to meet the needs of the local community.

All of the values of heritage need to be understood. This includes cultural values, values to the local economy, social and community values, environmental and sustainability values.

Planning for sustainable growth

There should be a clear relationship between the approach to heritage and the overall growth strategy of the neighbourhood plan (how it achieves sustainable development). Planning for growth can help to make historic centres more viable. For example, concentrating new housing in and around a town or village centre increases the catchment, helping to make local businesses and community facilities more viable. Housing growth is often part of the solution for historic town centres.

At the same time, heritage can help to deliver growth by accommodating new uses, forming a basis for regeneration and creating a quality of place to attract investment, residents, shoppers and visitors. As mentioned previously, heritage can have a powerful transformational role in some urban and rural areas. So there is a close and interactive relationship between heritage and growth. Conservation objectives are more likely to be realised if planning policies allow a place to grow and adapt to meet the needs of the local community and economy. The needs of tourists and visitors are also important.

Enabling heritage-led regeneration and economic development can be a key component of planning policies, especially in transitional historic areas where large-scale changes of use are occurring. This includes areas where decline has occurred, where low land values and rentals can be a magnet to small-scale enterprise, knowledge-based business and creative industries. This can help in diversifying urban and rural economies.

At the same time, growth must be sustainable as poorly planned growth could be harmful to an area's heritage. Dispersed growth could harm rural areas and generate traffic. Acceptance of poorly designed and low-quality development not only harms character, but can undermine confidence and lock an area into a cycle of poor performance. In particular, it is important to ensure that new development integrates with established centres, in particular through good pedestrian connectivity and permeability. Ease of movement is not just about pedestrian convenience; it can fundamentally affect the viability of town, village and local centres.

Planning for historic areas must consider sustainability in its wider sense. New development in historic areas can enhance sustainability, but can also make places less sustainable, if poorly conceived and designed. Policies should ensure that new uses and growth are allowed in the most sustainable locations. This could include sites within existing rural settlements, in urban extensions, or in areas well served by public transport and community facilities. This can be achieved by various means, such as site allocations, definition of growth envelopes, identification of areas of development restraint, and designation of Local Green Space.

When dealing with heritage, it is essential to understand the ongoing process of change that created historic places. A continuing process of change will ensure their survival in the longer term. Conservation is not about preventing change, but about reconciling the conservation of the special architectural or historic interest of historic areas and buildings with their continuing use and adaptation. Neighbourhood plans provide an ideal means of addressing this need in specific localities.

In developing planning policies, sustainable development must be considered in the terms set out in the NPPF as having social, economic and environmental objectives. So heritage must be addressed as an integral part of the wider social, economic, environmental planning of the area. Groups involved in preparing neighbourhood plans tend to address heritage issues through a combination of specific heritage-focused policies or more widely through land use, growth, urban design and other policies that impact on how historic buildings are used and how historic areas adapt to meet the needs of current and future generations.

Neighbourhood plan policies can only address planning issues. However, it is useful to be aware of other legislation that affects historic areas. This includes legislation on highways, environmental health, health and safety, equality, accessibility, building regulations, fire and local government.

7.3 Policies for heritage

General considerations for policies

Policies must have a clear purpose and planning rationale and be evidence based. It is essential to have regard to national and strategic local policies when drafting neighbourhood plan policies and to avoid merely repeating such policies.

The need to achieve sustainable development should also be considered by ensuring policies enable growth, but also ensure that such growth takes account of the needs of future generations. Enabling heritage-led growth and regeneration is one of ways of addressing this requirement.

Economy and employment

Economic development and employment could be addressed by land-use policies to support diversification, for example in transitional commercial and industrial urban areas or to support rural diversification.

Policies for city and town centres can enable diversification, allowing such centres to adapt so as to remain viable and competitive. This includes support for non-retail uses, such as food and drink, cultural, recreational and community uses. Policies could seek to protect ground-floor premises from residential conversions, as these can compromise surrounding commercial uses. Land use policies can enable heritage-led regeneration in towns, perhaps including allowing meanwhile uses.

Building conversions involving residential and commercial use could be supported, but the need for hours of operation conditions on commercial uses to deal with potential conflicts should be considered.

Uses to support rural enterprise and tourism could be applied to former agricultural buildings. Policies can encourage and enable employment development and community facilities as part of a balanced mix of uses.

Site allocations could enable new commercial and employment development in and around historic centres.

To enable heritage-led regeneration, policies could ensure that new development, including building conversions, include provision for high-speed broadband.

Village centres

Village centres can have viability challenges, as many residents can work in different areas and use shops and facilities outside of the village. Planning policies can provide some protection for community facilities, but should also enable centres to diversify. Planning for new housing can be a way of increasing the catchment of villages, so supporting local facilities.

Housing

Policies to support residential use of upper floors in town centres could be drafted. Site allocations could ensure that new housing growth could be focused in and around town centres and villages and other areas well served by community and transport infrastructure.

Where there are viability issues around existing or new housing, policies could seek to enable the creation of employment opportunities in the area, to create more demand for the housing. In high-growth areas, former industrial buildings could be identified for residential conversion.

Urban design and character

Good layout and design are crucial elements of ensuring that development is sustainable (economically, socially and environmentally). This includes pedestrian convenience, safety and natural surveillance, a well-functioning public realm, integration with existing townscape characteristics, mixed use, access to a range of community facilities, and green infrastructure that supports sport and physical activity.

The layout of an area and enclosure and definition of streets and spaces by surrounding buildings are a key part of historic character. So townscape analysis is essential to underpin design and character policies. Responding to the setting of listed buildings or the character of conservation areas is often about good townscape principles.

For significant development sites in and around historic areas, policies could be augmented by a site-specific design or development brief.

Design and character policies should avoid imposing stylistic imitation. The character of most historic areas is based on architectural diversity, resulting in change over time. Mock historic buildings can also undermine the integrity of the genuine historic environment. So care is needed in historic areas to enable bespoke, site-specific, high-quality, creative design.

Design policies may also clarify how alterations to and extensions of existing historic buildings will be considered, including contemporary interventions.

Transport and infrastructure

There can often be tension between conservation and transport. Transport and design policies could seek to ensure that parking is well integrated into development, so that streets and public spaces are not dominated.

Policies could also ensure that highway upgrades to enable new development take account of historic character. Similarly, the impact of traffic movements and congestion on character could be highlighted.

Heritage protection

There are already strong national policies on heritage, in addition to special statutory duties to consider impacts on listed buildings and conservation areas. In addition, local plans contain heritage policies. There is no point in repeating these. Indeed, an independent examiner is likely to strike out policies that repeat or are too similar to existing policies.

Neighbourhood plan heritage policies should therefore focus on locally specific issues. For example, they could recognise and protect the operational requirements of heritage sites, like working windmills or visitor sites. Heritage policies could also set out those parts of the area that would benefit from redevelopment, such as poor-quality buildings and undeveloped land.

A specific policy on historic assets on a local list could be included, if absent from the Local Plan.

In conservation areas, policies could highlight and protect specific local characteristics, such as boundary treatments. The level of detail of such policies would depend on whether or not there is also an Article 4 Direction for that conservation area.

7.4 Designations

Neighbourhood Plans cannot make heritage designations. For example, they cannot designate conservation areas or make Article 4 Directions. These have to be designated by the local planning authority.

If new designations were considered to be necessary, then the neighbourhood plan group would need to approach the local planning authority at an early stage. Given the shortage of design and conservation staff in many authorities, there may be little capacity to undertake designations. However, the neighbourhood planning body could offer to undertake the preparatory work for a conservation area designation, for example. An Article 4 Direction may be more challenging to achieve.

If the emerging neighbourhood plan includes policies reliant on such designations, then the designations would need to be in place before the consultation and examination stages of the neighbourhood plan.

However, neighbourhood plans can undertake Local Green Space designations. These can be useful in protecting spaces valued by the local community.

Local Green Space designations could be used to protect registered historic parks and gardens, the landscape settings of listed buildings or other areas and spaces that contribute to local character.

In all cases, such designations would need to meet the criteria for Local Green Spaces set out in the NPPF (Paragraph 100).

7.5 Making the plan

Once the plan is drafted, it is subject to consultation (Regulation 14) by the neighbourhood planning body. This includes sending copies to statutory consultees, including Historic England.

Any representations will need to be considered and, if necessary, modifications to the draft plan can be made.

The plan is then submitted to the local planning authority, together with supporting statements. It is then publicised and an independent examination is held. If successful at the examination stage, the plan is modified (if necessary to meet the basic conditions) and then subject to a local referendum. A majority 'yes' vote requires the plan to be 'made' and it becomes statutory planning policy.

8 | Community-led development and projects

8.1 Direct delivery

Some neighbourhood planning bodies become interested in direct delivery of projects and development. Where the market is unlikely to deliver local projects, or the aim is to deliver projects with a clear community purpose, taking on property or land can be a way of achieving the community's aims.

8.2 Taking on historic buildings

Asset transfer is a common approach. Usually, this would involve a community organisation taking on property from the local authority or other public body. However, it can also involve privately owned property. Asset transfer can involve transfer of the freehold, but can also be achieved through leasing arrangements. Partnerships are another possible approach.

Taking on assets can also be a means to generating income for community organisations. In high-growth areas, rental incomes can be considerable. In under-performing areas, a more complex business model is often required to make assets viable.

Before taking on property, it is essential to consider feasibility, including economic viability. This should include consideration of both the capital costs of acquisition and project delivery and the longer-term costs and revenue implications of running the facility. A realistic and sustainable business plan is crucial and many funding bodies will expect to see this.

8.3 New build and other community projects

There are often opportunities for new-build development in historic areas, for example on vacant sites or through the redevelopment of poor-quality buildings. New development may also be a means to enhancing the local area, through exemplar design. It is also an opportunity to meet specific local needs and to help regenerate an area or make it more viable. This can include new housing, commercial development or community facilities.

Other community projects could include, but aren't limited to:
- Enhancement projects to improve public spaces
- Interpretation initiatives
- Awareness and education initiatives
- Business support for shops and other businesses
- Promotional initiatives.

Annex 1: Design and character tool

Townscape, landscape and spatial characteristics

In many areas, the main layout has been established for several centuries, whilst in others it may have changed beyond all recognition. Historical maps should show the different phases of growth of an area over time. The general townscape characteristics are often similarly well-established, especially the relationship between built frontages and streets and spaces (often referred to as enclosure). This is why layout, townscape, enclosure and the definition of streets and spaces are such important elements in understanding the character of historic places.

Strong enclosure would be created by rear-of-the-pavement terraces, whilst buildings set back from the road with front gardens would create a much looser kind of enclosure. In addition to enclosure, townscape character also includes consideration of scale, massing, roof profiles and elevational treatments.

Key views should be identified. These may be framed by streets and buildings. They may include views to landmark buildings or to open landscape. Topography is also important and is often reflected in an area's townscape, for example in terraces with stepped or sloping roofs.

Key streets and spaces should be identified and their townscape characteristics examined. Some areas will have more uniform character, whilst other areas, or even some streets, will have very varied character. Other transport routes, like canals, have their own historical interest.

Key questions:

- How are streets and spaces enclosed by buildings?
- Is enclosure also created by walling, fences, hedges or other structures?
- What is the character of the townscape?
- How has the area developed over time?
- What are the main urban spaces?
- Are there any key green spaces or landscapes in the area?
- What kind of topography does the area have?
- Are there any key views through or out of the area?
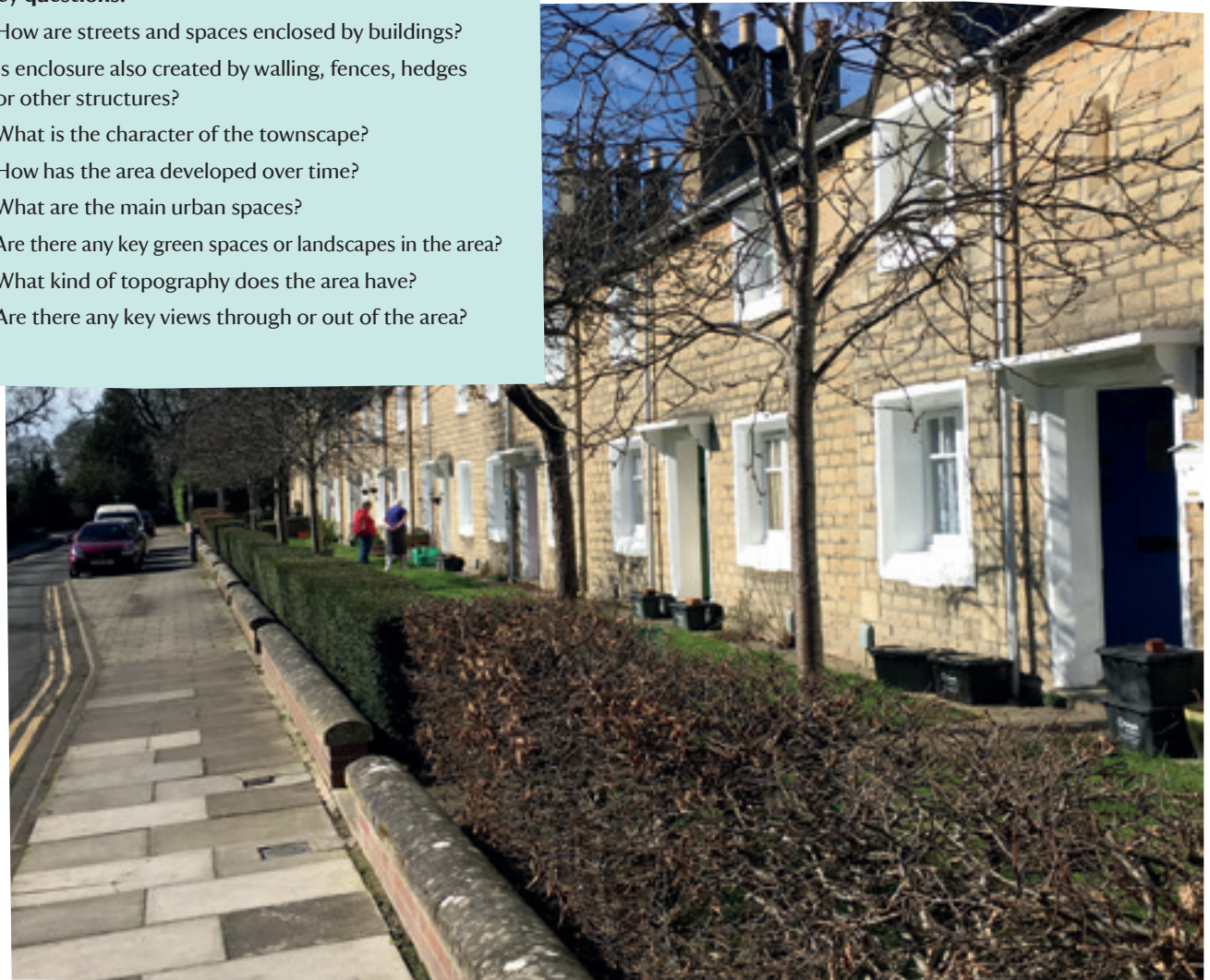
Architecture and buildings

Architecturally, places have changed constantly over decades and centuries. So the architectural character is often based on diversity of styles, construction techniques and building types. For areas developed in a more planned way, there may be more uniformity. Also, many historic areas are a mixture of vernacular buildings and polite architecture.

Vernacular buildings are based on function and the materials and constructional techniques available in the local area. Polite architecture is based on conscious design principles, often based on national or international influences, and sometimes using materials from wider sources and deliberately contrasting with an area's traditional materials. Many buildings fall between the two, with both vernacular and more formal elements. The special interest, character and local distinctiveness of an area are based on a combination of vernacular buildings and polite architecture.

Very high-quality modern buildings or extensions can also contribute to the character and special interest of an area and may be worthy of individual protection in the future. It is important to avoid presumptions about the value of buildings based on age alone. Some of the most vulnerable, unprotected and under-appreciated heritage dates from the second half of the twentieth century (rather like Victorian architecture was under-appreciated in the post 2nd World War decades). However, there is a need to be very selective with more recent buildings and area.

A neighbourhood plan evidence base is unlikely to go into depth with regard to analysis of the special interest or significance of individual buildings or structures, but may identify common characteristics or features of local vernacular buildings or polite architecture. Buildings of particular interest should be highlighted.

Key questions:

- What is the architectural and building character of the area (uniform, diverse, vernacular, formal, etc.)?
- Is there a local vernacular and what are its characteristics (construction, materials, etc.)?
- Are there good examples of more formal architecture and any particular landmarks?
- Do any recent buildings and extensions contribute the character and special interest of the area?
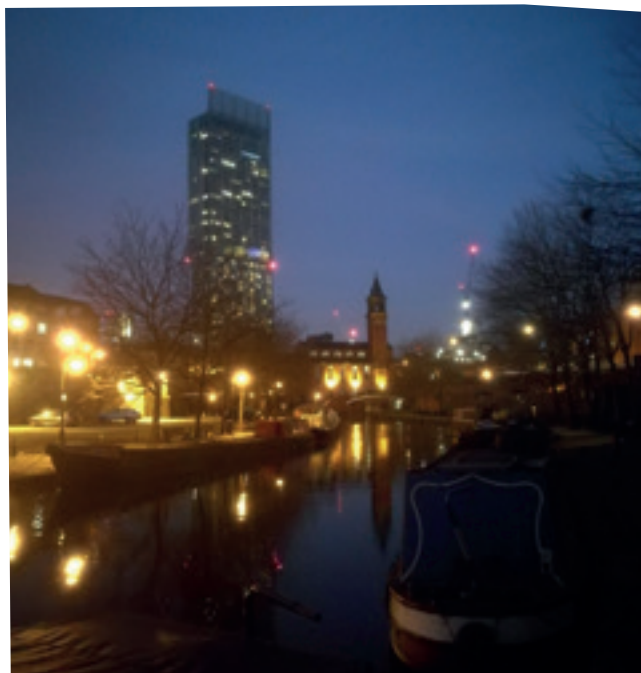
Design movements and principles

Historic movements in architecture and town planning may be apparent in the forms and styles of buildings and the layout and townscape of places. For example, movements of the 20th century, from Arts and Crafts to the New Brutalism and High Tech, are based on ideas around 'truth' to structure and materials, looking back to Gothic architecture and vernacular buildings. Classical and some Modern Movement architecture are based on proportioning systems and ideas about composition or formal layouts.

In other places, such as some villages, the character will sometimes be more informal and organic. However, even in villages, there are often areas of a more formal nature, for example classical buildings and symmetrical planning.

Key questions:

- Are the buildings based on any underlying design principles or movements (for example Modernist, Arts and Crafts, Classical)?
- Does the layout of the area reflect any formal planning principles or design movement (for example, garden suburb, neoclassical planning, picturesque), or is it informal and organic?
- Does the area include early or leading examples from any historical movement?

Technology, materials, fabric and features

Materials used in buildings, structures and ground surfaces reflect the availability, technologies and trends of the time. Structural and constructional materials and finishing, walling and roofing materials all contribute to special interest and character.

Innovation in materials or methods of construction can be important factors determining special interest.

Ground surfaces can also make a huge contribution to character. This can include things like paving, stone setts, and metal curbs.

Key questions:

- What are the predominant constructional methods, materials and features of vernacular buildings?
- What other materials are used in the area, including in polite architecture?
- Are there any examples of innovation in construction or use of materials?
- Are there any surviving historical ground surfaces?

Associations

Associations with famous people or events can contribute to the special interest of buildings and areas. Occupants also can add to the special interest, as recognised by 'blue plaques'. This could include people or events associated with any area of life and society (for example, politics, literature, science, arts).

Buildings by leading architects or designers should be identified. These often have the potential to be high-grade listed buildings.

Key questions:

- Is the area or any of the buildings and spaces associated with historical figures or events?
- Are there any works by well-known or leading architects or designers?

Completeness and scarcity

The survival of buildings and places in an unaltered form can be important in assessing special interest. However, some alterations can actually enhance that special interest.

Scarcity is also a key factor, where few buildings of a certain type were built. Wartime defence structures are a good example. For older buildings, where much of the building of the period has been demolished, even mundane buildings have value (because few remain).

Key questions:

- Are there very old buildings or townscape, from periods where relatively little survives?
- Are there any rare or scarce building types?
- Is part of the character based on buildings or townscape in a very original, unaltered condition?

Other aspects of character

It is impossible to create a comprehensive list of elements that contribute to special interest or character. The above questions are just some of the main things to consider. Other factors to consider could include glimpses, boundary treatments, historic signage or street furniture, and so on.

Key questions:
• Are there any other features or characteristics of the area that contribute to its special architectural or historic interest?

Harm

Once the character is understood, it will be possible to identify where harm to that character has occurred. Such harm could include loss of original features, such as doors, windows and shop fronts. Harm could be based on poor-quality alterations, extensions or new buildings.

When judging new development, the focus should be on quality and how it complements the character of the area. This is not about stylistic imitation. Indeed, imitation can be very harmful in development affecting the setting of distinctive historic buildings.

Clutter created by signage and street furniture may be an issue. Poor quality surfacing of streets and spaces may detract from their character. Car parking may dominate streets and spaces. These are just a selection of common examples of harm.

Where harm has occurred, this may be down to lack of enforcement or inadequate protection (for example, lack of an Article 4 Direction).

Key questions:
• Has harm been caused by insensitive or inappropriate alterations and what is the nature of these?
• Is car parking well integrated into the area?
• Are there any problems with street clutter from signage and street furniture?
• Is more recent development well-designed and of high quality?
• What other kinds of harm are apparent?

Annex 2: Sustainability analysis tool

Sustainability considerations

Sustainability considerations are central to neighbourhood planning in terms of meeting the basic conditions. So it is useful to analyse the characteristics of historic places in terms of sustainability. Such analysis needs to address uses, live/work patterns, movement, and other factors. Some of the key factors to consider are as follows.

Permeability and pedestrian convenience

Historic layouts tend to be more permeable and convenient for pedestrians, especially where the layout predates widespread use of motor vehicles. For example, layouts based on grid patterns of perimeter blocks tend to provide good choice of movement for pedestrians.

Key questions:
- Is the area permeable for pedestrians, with good choice of movement?
- Does the public realm provide for pedestrian convenience, including key public spaces?
- Are there problems with traffic congestion and do these affect pedestrian movement or the quality of environment?
- What kind of public transport services does the area have?

Mixed use

Because historic areas have developed over time, they usually have a finer grain of mixed use compared to areas that have been redeveloped more comprehensively. The mix of residential, business, community and other uses can reduce the need for car-based journeys, thus creating more sustainable live/work patterns.

Historic city, town and village centres and some local centres in large estates can be a focus for community and other facilities and also tend to offer better accessibility by public transport, though this is less the case in isolated rural areas. Viability can be an issue for some villages, in particular where the population has changed to include a higher proportion of commuters. Increasing the catchment of an area and creating affordable housing for people working in the area can be a way of helping viability. Sometimes, historic buildings have been converted to create new community facilities.

Key questions:
- What are the use characteristics of the area?
- Does the mix of uses reduce the need for journeys and support sustainable live/work patterns?
- Are recent changes of use adding to or diminishing the mix of uses?
- Does the area have a range of community facilities?
- Are there questions of viability for some of these community facilities?
- Do historic buildings or spaces add to the mix, for example by supporting arts, performance or other cultural, recreational and community activities?

Choice and diversity

Research has shown that historic areas support more independent businesses. Minority or low-profit goods are usually to be found in older more peripheral areas, where rentals are lower, rather than in newer shopping areas.

Key questions:
- What is the mix of independent businesses and national chains in the area?
- How has this mix changed in the past decade or two?
- What kind of minority or specialist shops and facilities are present?
- What kinds of businesses or facilities are dependent on low rentals to make them viable and what are the trends in terms of property prices?

Buildings, townscape and uses

Historic centres often include high-density, party-wall construction. This creates insulation benefits. Also, such development presents active street frontages, creating natural surveillance. This helps streets and spaces to feel safe.

Historic buildings tend to incorporate durable materials and have been capable of adaptation to meet modern needs. In terms of energy performance, historic buildings vary greatly. Also, the scope for retrofitting varies, depending on the nature of the building in question (including the sensitivity of interiors). Building performance is largely a matter for the building regulations, rather than normal planning controls. However, for listed buildings, consent may be required for some adaptation works to improve building performance.

The use of buildings also needs to be sustainable. For example, benefits from upgrading a building could be cancelled if the proposed use is likely to generate large traffic movements, especially if a building is isolated or in an environmentally sensitive area.

Key questions:
- What are the forms of buildings and townscape in the area?
- Is there good natural surveillance of streets and spaces?
- What new uses are sustainable in the area?

Credits

The Author

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