



‘The Setting of Heritage Assets: English Heritage Guidance’ Consultation Draft
A consultation response by the English National Park Authorities Association
(ENPAA)

November 2010

This is a response from the English National Park Authorities Association. The English National Park Authorities are the planning authorities for their respective areas and we welcome this draft guidance document from English Heritage on the setting of heritage assets.

We understand that the draft guidance is designed to be used alongside English Heritage’s *‘Conservation Principles, Policy and Guidance’* (2008) and other guidance on historic characterisation, building in context and historic views. It will also sit alongside English Heritage guidance that has already been published on tall buildings and wind turbines.

Planning Policy Statement 5 *‘Planning for the Historic Environment’* confirms that the settings of both designated and undesignated heritage assets are a material consideration in the planning process. It also directs planning authorities to take into account the possible harm to an asset through development within its setting and to identify opportunities for enhancing the settings of heritage assets. This guidance is therefore a welcome expansion on the summary advice contained in PPS5 and English Heritage’s *Conservation Principles*.

We have responded to the specific questions contained in the consultation document (below). One general point that we wish to raise concerns the variety of heritage assets and their settings. PPS 5 provides a wide definition of heritage assets as valued components of the historic landscape including buildings, monuments, sites, places, areas or landscapes. This draft guidance on setting tends to treat heritage assets in terms of built structures and there is great emphasis on visual considerations which may not be as relevant to the settings of below-ground archaeological sites and designated landscapes. The specific advice that already exists for tall buildings and wind turbines indicates the possible need for more detailed advice for other types of heritage assets (such as buried archaeological features, designated landscapes or extensive industrial monuments) than is contained within the draft guidance.

Responses to the specific questions in the consultation:

(1a) Do you consider that this English Heritage guidance on Setting conforms to the Government’s policies and guidance in the PPS and Practice Guide?

We agree that in general the guidance on setting conforms to PPS5 and English Heritage’s Historic Environment Planning Practice Guide. It amplifies the outline advice of Policy HE 10 of the Practice Guide on the setting of designated heritage assets.

(1c) Do you consider that it will assist implementation of the Government's new policies and guidance?

The suggested procedures for assessing the contribution of setting to the significance of heritage assets are firmly based on English Heritage's *Conservation Principles. Policies and Guidance*. These are clearly set out and comprise evidential, historical, aesthetic and communal values. However the procedures for assessing the implications of change affecting setting contained in the consultation draft are relatively subjective and may lead to different interpretations by applicants and determining authorities. More specific advice relating to specific types of heritage assets may be of help here. This is particularly relevant when considering the impact on protected landscapes rather than individual heritage assets. We would be happy to have discussions with English Heritage on this, and are already in early discussions with Natural England.

(2a) Do you think this approach is helpful and that it is successfully achieved within the draft guidance?

English Heritage's *Conservation Principles* are well established and provide a coherent basis for the management of heritage assets. We believe that taking this approach to the issue of setting is helpful and is achieved in the guidance document such as in relation to assessing the contribution of setting to significance. Its application to assessing the implication of change is less successful (see above).

(3a) Do you agree with this approach and, if so, have we struck the right balance to ensure our draft guidance applies to the majority of circumstances?

The wide definition of heritage assets and the consequently wide range of settings provide a difficulty for the formulation of guidance. There is a danger that the guidance is too general to be of great help in specific cases, which is perhaps underlined by the provision of separate, more specific guidance for tall buildings and wind turbines.

(3b) Are there additional issues that you consider should be included in specific guidance on particular kinds of development?

The guidance has an emphasis on built structures and the effects of development. There is rather less guidance on issues of general land management and changes to the settings of heritage assets, particularly for rural areas. The guidance should be expanded to address these issues, including the effects of new woodland planting and the cumulative effects of changes in farming practice. This would be particularly helpful in relation to advice given on the management of historic assets through agri-environment grant schemes.

(4a) Do you agree that these are the correct factors to consider?

The framework is helpful and appears to include the relevant factors.

(4b) If not, can you suggest which factors should not be considered or which additional factors should be?

An additional factor to include would be the character or nature of development affecting setting. This could be either beneficial or detrimental depending on both the nature of the development or change and the type of historic asset that is affected. For

example, some industrial development within the setting of a heritage asset might be either beneficial or detrimental depending on the character of the historic asset affected (eg. whether industrial archaeology or a prehistoric stone circle). This could also apply in a rural landscape setting where the character and extent of new woodland planting or major changes in farming practice may affect the setting of designated landscapes. This will require ever closer working with Natural England. We believe such collaboration would be consistent with the direction of the Government's public body reform and Arms Length Body Reviews.

(4c) Do you agree that the questions posed in paragraph 49 are a helpful way of structuring the assessment framework?

Yes, these questions are helpful.

(5a) Do you have views on the practicality of the approach suggested in paragraph 58? We would particularly welcome views from Local Planning Authorities.

As each individual application is determined on its merits it may be possible for local planning authorities to prevent the adverse effects of cumulative development. It is likely that this will require policy advice on the settings of heritage assets to be included within Local Development Frameworks (eg. in a Supplementary Planning Document on Historic Environment). In addition, LPA's could attach an 'informative' to a planning decision notice stating that subsequent development may not be permitted on the grounds of the detrimental effect of cumulative change to the setting of a heritage asset. Planning authorities could also adopt local guidance on assessing the impact of development on the setting of protected landscapes, based on the guidance set out in this document.

(6a) Do you think this approach is helpful?

It is certainly helpful to provide examples and discussion but these would be more useful if they demonstrated more clearly instances of development and change that have had both detrimental and beneficial impacts on the setting of heritage assets. It would also be useful to include examples where tree planting and changes in agricultural practice have had, or would have, significant impact.

One such example might be the growth of scrub vegetation on Dartmoor which has followed changes in grazing regimes. This has necessitated the designation of 'Premier Archaeological Landscapes' in which vegetation is periodically cleared from archaeological monuments but their wider settings remain substantially changed, particularly in terms of visibility.

It is recognised that the guidance defines what it means by development and is written accordingly but the concept of the "setting of heritage assets" is relevant to other drivers of landscape change. The guidance will, we suspect, inevitably need to be used in a wider historic environment context than the chosen definition of development and, for ease of use, the text and analytical images should reflect this.