Background Papers, if any, are specified at the end of the Report

## CHILTERN DISTRICT HERITAGE STRATEGY AND RELATED HERITAGE WORK PROGRAMME

Contact Officer: David Waker (01494 732267)

#### RECOMMENDATION

- 1. That Cabinet approve the Heritage Strategy attached as Appendix 1)
- 2. That any amendments to the Strategy resulting from the Cabinet discussions, and any subsequent minor updates are delegated to the Head of Sustainable Development.
- 3. That Cabinet agrees that the Council produce a local list of Heritage Assets in consultation with local groups as part of the Strategy and that:
  - a) That the criteria for potential inclusion in the Local List are agreed.
  - b) That the process for agreeing inclusion of heritage assets on the Local List are as proposed in the report ie Policy Advisory Group consideration of potential heritage assets with a recommendation to Cabinet on the items included.
- 4. That Cabinet note the work done to date on the Conservation Area Review progress and:
  - a) approve the schedule and priority of future conservation work to be undertaken, as set out in table in paragraph 25 of the report.
  - b) Subject to available funding Cabinet delegate authority to the Cabinet Member for Sustainable Development to carry out programme adjustments within the approved budget.
  - c) That additional funding to complete the programme is considered as part of the 2015/16 budget considerations.
- 5. That Cabinet note the content of the three English Heritage draft advice notes currently being consulted upon with the response to the consultation being delegated to the Head of Sustainable Development in consultation with the Cabinet Member for Sustainable Development.

#### Relationship to Council Objectives

Objective: We will deliver cost effective customer focussed services.

2. Listen to our customers – consult with you on key issues and listen to results

Objective : we will strive to conserve the environment and promote sustainability.

1. Conserve our valuable heritage including the AONB

#### **Implications**

- (i) A key decision
- (ii) This matter is, for initial stages, within the Policy and Budgetary Framework but will require additional resources as set out in the report to compete the proposed programme of works.

## **Financial Implications**

The Heritage Strategy has been carried out as part of the normal Planning Policy workload, however on-going work set out in the Strategy will require additional resources. The programme of conservation areas reviews had an agreed budget from the planning reserve of £25,000 (£4,740.60 now spent) and £20,000 in the 2014-15 budget. £3,000 has also been agreed for work in relation to a listed barn in Great Missenden. A combined budget total of £43,259 remains for the implementation of the Conservation area work for 2014/15. Additional resources will be needed in 2015/16 and (possible subsequent years) in order to complete the proposed works.

## **Risk Implications**

Failure to have an up-to-date understanding of the importance of heritage assets in the District could mean that the Development Plan policies would not be found sound or the Council will not be able to defend planning decisions successfully at appeals. The Heritage Strategy provides a mechanism for the Council to demonstrate its understanding of heritage assets in the District and as a stand-alone document can be regularly updated as part of the Council's evidence base required by Government Guidance.

## **Equalities Implications**

The Heritage Strategy relates to heritage assets across the District as a whole. While the conservation area review programme relates to the areas designated as conservation areas. It is not considered that either project would have any direct equalities implications. Potential equality issues could emerge as part of indirect implications (such as equality access to heritage buildings) but these would need to be considered at that time.

## Sustainability Implications

The Heritage Strategy relates to the heritage assets across the District where they are found. For historic reasons they may not always be in the most sustainable locations or constructed of the most sustainable materials. However the strategy covers the issues related to sustainable improvements to assets where the improvements would not harm the original purpose of designation and also proposes the reuse of historic assets rather than them falling into disrepair. It is more sustainable to re-use particularly a building than to build afresh. Also heritage assets (national or potentially local) can play an important role in 'place shaping' or creating and reinforcing local identity which can have sustainability benefits.

#### Report

This report covers four main matters: the Chiltern District Heritage strategy; the Conservation Area Appraisal and Conservation Areas Review Programme; to consider the justification for a local list of heritage assets and criterion or inclusion of heritage assets on such a list; and to consider a consultation produced by English Heritage on three new heritage advice notes.

#### **Background**

- 2 Chiltern District is well known for its fine countryside and historic villages and town centres. Much of the historic fabric is already protected in some way either by national designation such as listed buildings, scheduled monuments or AONB designation or by local protection via the designation of conservation areas. However there are potential gaps (for example the Council does not have a list of local heritage assets) and others like conservation areas are in need of review or have outdated evidence to support them. Also the Council does not have conservation area action plans.
- The District has benefitted from being largely covered by the Metropolitan Green Belt and nationally designated landscape thorough the Chilterns Area of Outstanding Natural Beauty (AONB). This has helped to protect heritage assets in the countryside from harm. However the likely need to accommodate more development in the future means that more assets either known already or as yet undiscovered will become more under threat and as such need some protection, evidence base support and careful consideration. Government guidance increasingly states that evidence should be upto-date and clearly show the importance of any heritage assets that may need protection.

4 Although the Council has always given the protection of its heritage importance in the Development Plan it has never specifically set out a strategy detailing how it would deal with its heritage assets. Hence the role for a Heritage Strategy. The District's conservation areas are good examples of the Council's commitment to its heritage but should have been regularly updated to make sure the areas are current. In fact most have not been amended since their designation hence the need for conservation area reviews. Other than the nationally designated heritage assets and conservation areas there is no current protection for those local heritage assets which might be of significance to the local population or to the history of the District – hence the need for a local list of heritage assets. Finally Government is continually redefining its guidance and currently is consulting on new draft guidance. The Council has been given an opportunity to comment to attempt to mould guidance to make it useable at a district level and this is proposed to be delegated for a response taking account of any views expressed by Cabinet views...

### **Heritage Strategy**

- As described above a Heritage Strategy is an important document to show the Council has a clear and up-to-date understanding of its heritage assets and how it is seeking investment to protect and enhance its heritage assets. The Strategy will provide a useful evidence base in relation to the existing and future formulation of planning polices and to ensure any planning policy documents produced have a sound evidence base in relation to the Districts heritage.
- Members may recall that the draft Heritage Strategy formed part of the evidence base for the Delivery DPD. Cabinet approved the document as part of the evidence at its meeting on the 11<sup>th</sup> February 2014. However, it was clearly stated that this was a draft document which would be updated. The intention of this report is to approve a final version of the Strategy, albeit that later updated versions will be needed in due course.
- It is important that any heritage strategy produced for the District involves engagement with the public and interest groups. By involving key interest groups in the strategy it is more likely to cover all the important heritage assets in the District and to have the support of those key heritage organisations. Advice from English Heritage is that heritage strategies should be formulated with the involvement of local groups.
- 8 Consultation on an emerging Heritage Strategy was first consulted in April to June 2013 as part of the Delivery Development Plan Document (DPD) Public Participation. In addition the Draft Strategy was part of

the DPD evidence base as part of the pre-submission consultation from 20<sup>th</sup> February to 4<sup>th</sup> April 2014.

- Members will also be aware we undertook a consultation on the latest draft of the Heritage Strategy from the 27<sup>th</sup> June until the end of July 2014. This consultation involved all District Council members, all the District's town and parish councils and all known amenity and heritage related groups. The consultation invited those consulted to suggest other local groups who may be interested in a Heritage Strategy and where alternatives were suggested they were also consulted. The draft Heritage Strategy which formed the consultation version took account of comments received as a result of consultation on DPD.
- 10 A copy of the latest Heritage Strategy is attached as Appendix 1. In brief the Heritage Strategy;
  - a) describes the location of the District
  - b) defines a heritage asset
  - c) describes the development pressures facing the District
  - d) describes other pressures facing heritage assets such as climate change and the drive for sustainability
  - e) lists the currently identified heritage assets within the District
  - f) raises the possibility that as the District is altered through new developments that more heritage assets may be discovered
  - g) describes how the Council will deal with heritage assets at risk
  - h) proposes setting up a local list of heritage assets. (This is discussed below in this report)
  - i) outlines areas where the Council's current evidence is out of date
  - j) describes the process of conservation area appraisals and review (which is in progress and discussed below in this report)
  - k) lists the current heritage asset evidence base available to the Council
  - I) sets out a Heritage Strategy Statement and actions
- 11. The intention is that the Heritage Strategy should be a stand-alone document forming part of the Council's evidence base in relation to the formulation of planning policy but also as a useful source of evidence in the planning application decision making process and future work programme.
- 12. At the time of writing this report not all those consulted responded. Cabinet will be updated verbally at the meeting. A list of those consulted and who had responded is attached as Appendix 2. While some responses to date made detailed comments on the content of the document there were no negative comments. Some positively welcomed the Council's initiative in producing the Strategy.
- 13. Comments received, up to the time this report was drafted, have been taken into account in the revised draft document.

## A Local List of Heritage Assets

- 14. Government guidance refers to the importance of heritage assets and that local planning authorities should have up-to date evidence about the historic environment in their area<sup>1</sup>. The guidance also refers to the significance of non –designated heritage assets in making planning decisions which may affect heritage assets. Planning guidance<sup>2</sup> states that local planning authorities may identify non-designated heritage assets.
- 15. The National Planning Policy Framework definition of heritage assets is: 'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).'
- 16. Responses to the consultation on the Heritage Strategy have been supportive of the suggestion that a local list be set up and in one case expressed surprise that the Council did not already have a local list in place.

### Criteria for inclusion in a local list of heritage assets

- 17. Although heritage assets can be any historical feature or building or place of an historical event the Government guidance points out that a substantial majority of buildings will have little or no heritage significance and therefore should not be considered as heritage assets. Only a few will have such significance that they should be considered as a material consideration in the planning process.
- 18. The consultation on the Heritage Strategy (and previously through Public Participation) invited consultees to suggest local heritage assets that they may wish to be included on a local list. The responses range from traditional buildings through to landscape features and traditional road signs.
- 19. Given the wide range of potential heritage assets all of which will be considered to be of importance to the people who have suggested them it is important to have an agreed set of criteria in place to assess whether assets would be included on a local list. To avoid weakening the local list and making it meaningless it is important that a fair set of criteria or principles are used to avoid any one area or group suggesting large number of local buildings or features as local heritage assets out of proportion to their true worth to the local historic character

<sup>&</sup>lt;sup>1</sup> National Planning Policy Framework Para 169

<sup>&</sup>lt;sup>2</sup> National Planning Practice Guidance – what are non-designated heritage assets and how important are they?

of the area. Once defined the Local List assets will be subject to planning policy control and as such will need to be justified at appeals for example.

- 20. For a local non-designated heritage asset to be included on the Council's local list, it would need to be evidenced as a good example of a local heritage asset (building or feature) and/or be of local significance for example a traditional barn, remnants of a traditional industry, rare watercress beds or heritage features important to local identity.
- 21. The suggested criteria for considering inclusion of a heritage asset on the local list are as follows:
  - a) The historic asset is demonstrably of local importance in its architectural design, decoration or craftsmanship.
  - b) The historic asset illustrates important aspects of the District's social, economic, cultural, agricultural, or military history and/or have close historical associations with locally important people or groups.
  - c) The heritage asset is a key building or feature within a conservation area
  - d) The heritage asset has a demonstrably important role in the local community or place identity
  - e) A site of an important local historical event.
  - f) Nationally designated historic assets may be included on the local list where in local terms the historic asset is of great significance to the heritage of the District or is the last remaining example of that type of asset in the District. (ie has a higher value locally than nationally even though it has national protection)
- 22. Assuming that Cabinet approve the setting up of a local list and the suggested criteria for local listing set out above then it is suggested that any list of proposed heritage assets identified by or submitted to the Council is considered by the Policy Advisory Group who will in turn advise the Cabinet. If the list is maintained as a stand-alone document and not part of the Development Plan then it can be regularly updated as heritage assets are discovered or existing assets need to be removed from the list.
- 23. It is therefore recommended that the Cabinet approve the setting up of a local list of Heritage assets.

#### **Conservation Area Review Programme**

- 24. As members will be aware the Council has commissioned a firm of consultants to undertake a Conservation Area Review Programme. The original commission to take the form of three main elements; to complete the 5 conservation area reviews commenced in 2004 see table below for names of areas ie. A ii) to v), to undertake an assessment of the whole District to identify where there was potential for new conservation areas to be designated, in relation to the Chalfont St Peter Neighbourhood Plan to assess if there was potential for a conservation area to be designated within the village centre and to advise the Council on other heritage associated work. Conservation area reviews to include evidence of their importance, a boundary review, policies to enable protection/enhancement and a suggested action programme (e.g. potential works/ management arrangements, to enhance the conservation area)
- 25. The conservation area review work is intended to be a rolling programme based on the available budget. The table below sets out the agreed funding so far and the work programme the funding can deliver. It also indicates future expenditure (provisional estimate from the current consultants) if additional funding is available in 2015/16. The estimates enable officer's to advise on the areas of work that can be commissioned now within the agreed budget and give an indication of additional costs involved should the conservation area review programme continue into the next financial year. Flexibility will be needed as the programme progresses.

Table: Conservation Area Review Programme and Associated Works			
A: Committed Expenditure (2013/14 to 2014/15). Approved budget of			
£25,000			
Work Item	Cost	Remaining	
	(excludes	Budget	
	VAT)		
i) Initial report / draft work programme			
ii) Penn and Tylers Green appraisal			
ii) Chalfont St Giles appraial			
iii) Chesham appraisal			
iv) Cholesbury and Hawridge			
v) Little Missenden appraisal			
vi) Assess potential for a Chalfont St	£15,802	£9,198	
Peter Village Centre conservation			
area linked to the emerging			
Neighbourhood Plan suggestion			
vi) District review for potential new			
conservation areas			
vii) Preparatory work to declare new			
conservation areas where needed	To be	To be	
and subject to Cabinet approval	determined	determined	
viii) Additional supporting policy work if	To be	To be	

identified	determined	determined	
Remaining Budget [subject to vii) and viii) above]		£9,198	
B: Suggested 2014/15 Budgeted Work Programme.			
Budget is £20,000 plus remainder from A: above (assumed to be			
£6,100)			
Proposed Work Item	Estimated	Remaining	
·	Cost	Budget	
i) Great Missenden appraisal	£5,538.75	£20,561.25	
ii) Amersham Old Town appraisal	£5,538.75	£15,022.50	
iii) Jordans appraisal	£3,554.25	£11,468.25	
iv) The Lee appraisal	£2,625.00	£8,843.25	
v) Chesham Bois appraisal	£3,554.25	£5,289.00	
vi) Weller Estate, Amersham appraisal	£2,625.00	£2,664.00	
vii) The Firs, Chalfont St Peter appraisal	£2,625.00	£39.00	
viii) Work areas from A above that had to	To be	To be	
be re-programmed or delayed	determined	determined	
C: Unbudgeted Proposed Work programme 2015/16 (subject to funding)			
Proposed Item	Estimated Cost		
i) Latimers and Chenies appraisal	£5,538.75		
ii) Shardeloes Parkland, Old Amersham	£2,625.00		
appraisal			
iii) Elm Close, Amersham appraisal	£2,625.00		
iv) Coleshill appraisal	£2,625.00		
v) Gold Hill East, Chalfont St Peter	£2,625.00		
appraisal			
vi) North Park and Kingsway, Chalfont St	£2,625.00		
Peter appraisal			
Sub Total	£18,663.75		
viii) Work areas from B above that had to			
be re-programmed or delayed	To be determined		
Estimated Total	£25,000		
Allowing for viii) above, inflation and			
contingency			

- 26. The priority order for the Conservation Area Appraisal Programme is based on the consultant's assessment of the existing areas and their suggested priority. This has been adjusted to take account of funds available and the potential for development pressures within the conservation areas as determined by officers. If the programme of conservation area reviews and appraisals is to be concluded then additional funding will be required in the 2015/16 budget setting process. The programme may also have to change due to budget constraints or changed priorities and as such it is recommended that the Cabinet Member for Sustainable Development is given delegated authority to adapt the programme whilst staying within budget.
- 27. As the further work has yet to be commissioned there is the option to alter the priority of conservation area appraisal work as set out in part B

and C of the table above. Therefore members are invited to comment on the priority order if they feel it is necessary.

- 28. The Consultants are also investigating some areas of the District which are not already designated as conservation areas to see if there is potential to designate new conservation areas. If new conservation areas are proposed officer's will need to go through a designation process and there will be additional costs associated with this work. At this stage it is not possible to estimate additional costs but will either result in the need for additional funding or adjustments to the programme set out in the table above according to which work area has the higher priority.
- 29. Additionally although not featuring in a current work programme, when commenting on the Heritage Strategy English Heritage offered the opinion that the Council may find it useful to consider a survey of Grade II Listed Buildings to assess which if any are at risk in order to have a more comprehensive understanding of the heritage issues in the District. It is not proposed that the Council undertakes this work at this stage, due to limited resources and existing knowledge of listed buildings, but is brought to Cabinet's attention as another potential option for future consideration.

# **English Heritage Proposed Historic Heritage Guidance Notes Consultation**

30. English Heritage are currently consulting on three draft advice notes as follows:

The Historic Environment in Local plans
Decision Taking in the Historic Environment
The Setting of Heritage Assets

Given this new guidance will be relevant to the Council as it carries out its planning functions in relation to historic heritage and any advice and or support it may get from English Heritage in determining planning applications and or devising planning policy, it is important that the Council responded to this consultation. The consultation period ends on the 5<sup>th</sup> September.

The Historic Environment in Local plans

31. The aim of this note is to '...assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework...' (NPPF) the note sets out the NPPF requirements and sources of heritage related evidence. It suggests that where the evidence base is weak for a local authority it may need to commission research. Evidence produced for local plan preparation can also form a useful heritage evidence base which councils should make publically

- available. The note describes councils having a positive strategy for conservation and enjoyment of the historic environment in its district and that this strategy should include a plan for the maintenance and use of heritage assets in the district. The Cabinet approval of the Heritage Strategy will put this Council at the forefront in meeting this requirement if put in place.
- 32. Planning policies should be written in such a way that whilst allowing necessary forms of development those developments can achieve positive improvements in the historic environment as required by the NPPF. The advice states that local plans should assess whether or not they should identify any areas where certain types of development should be limited because of the impact that form of development may have on the historic environment. It suggests that in addition to the NPPF there may be occasions where local planning policies will be necessary to show how a council will determine a planning application to take account of local distinctive or important historical features, how to deal with local architectural remains to protect or enhance local views and to cover any cross boundary issues in relation to heritage assets.
- 33. The advice states that site allocations should avoid locations that could harm the significance of heritage assets and makes reference to the use of the Community Infrastructure Levy and or section 106 agreements to improve repair or enhance local heritage assets. It also states that local infrastructure schedules should take account of the needs of heritage assets.
- 34. The advice note suggests that a heritage SPD may be useful to amplify or elaborate on the delivery of a heritage strategy. Finally the document refers to neighbourhood plans and the importance that they refer to heritage matters.
  - Decision Taking and the Historic Environment
- 35. The aim of this advice note is the same as the first note described above. This note gives general advice on decision making. It re-states the NPPF advice that when considering works to a heritage asset it is important to undertake pre-application discussions with the Local Planning Authority. It sets out what an applicant would need to before undertaking discussions. The applicant would need to understand the significance of the heritage asset they wish to do works to. Understand the impact of their proposal on the significance of the asset. Understand how to avoid or minimise any impacts. Look for ways to better reveal or enhance the significance of the asset. Justify any remaining harmful impacts and record any important parts of the asset that may be lost as a result of the works and storing that information.

- 36. The advice note then describes how you assess the significance of a heritage asset; these values can be aesthetic, communal, historic and evidential. Heritage assets can be affected by direct physical change or by changes to their setting. The understanding of a historic assets setting is important in assessing any planning application that may affect it. Understanding the significance of an asset whether it is its external features or internal fabric or its setting is also important in deciding what developments could be appropriate.
- 37. The note gives advice on the sources of information that might help in assessing the significance of a heritage asset. It then covers the issue of structure that may be listed by default. For example walls attached to a listed building or within its curtilage if pre 1948. And if alterations to those structure affect the main buildings listing.
- 38. The note covers archaeology and historic interest, in particular the issue that future development or investigation of existing assets may discover more archaeological remains that could help us to understand our heritage. The advice is keen to stress the importance of using appropriate expertise; it specifically mentions the use of relevant local authority specialists (it is worth noting that if this advice is published and future developers follow the advice for pre-application discussions on all applications affecting heritage assets the workload of the councils Historic buildings officer may well increase) it also adds that local amenity societies may also be a useful source of advice. The note also lists sources of expert historic heritage advice.
- 39. The note refers to the Historic Environment Records (HER's). And that local authorities should have access to HER's Chiltern District does have access to the HER maintained by the County Council.
- 40. The note states that planning authorities assessing applications to do works to a heritage asset should assess the particular significance of the heritage assets. Also that it is good practice to use professionally accredited experts. Heritage conservation is an objective of sustainable development and therefore a sustainable development is one that minimises the conflict between the heritage conservation and any other public benefits it may deliver. If the harm or loss to the historic asset is substantial the Local Planning Authority should consider the NPPF tests. For loss to be necessary there must be no other means of delivering similar benefits.
- 41. The note then describes the listed building consent regime and the fact that some works to a listed building will not require listed building consent. That to clarify if this is the case developers can apply for a certificate of lawfulness covering the proposals. It describes the new powers derived from the Enterprise and Regulatory reform Act 2013. These include a local listed building consent order which can be made by the local planning authority and grants listed building consent for alteration and or extension but not demolition of listed buildings. Or a

listed building consent order which can be made by the secretary of state and offers the same consents as the LPA consent order. Listed building Heritage Partnership Agreements which allow listed building consent to be granted for specified works of alteration or extension.

- 42. The note then describes how planning authorities should make decisions on planning applications involving a combination or historic architectural and archaeological interest. And that archaeological interests whether designated or not and their conservation should be a material consideration when considering planning applications for development. Where the loss of an asset is accepted then the advice expects councils to require recording and investigation of the assets. This recording should be undertaken by a professionally accredited organisation or individual with appropriate expertise. The best way to achieve this is to agree a written scheme of investigation between the developer and the local planning authority. Planning conditions or an obligation can ensure the history of any archaeological remains is recorded. Any finds should be recorded and a report produced if necessary with the format of the report to be agreed with the planning authority.
- 43. Special consideration needs to be given where investigation or actual development reveal human remains. It is suggested that on significant sites the investigation works should be opened up to the public to see before the development is completed.
- 44. The advice note stresses the importance of preserving our heritage and that this will not occur if there is no deterrent to those who seek to develop without seeking the appropriate consents. Therefore planning authorities should use their enforcement powers where necessary and the strategy for enforcement in the historic environment should form part of the local enforcement plan. Where developers are seeking to say a heritage asset is redundant and has no useful purpose they should provide evidence of marketing of the asset to demonstrate the redundancy of the asset. The advice note describes how this marketing should take place. The note also advises that where total loss of a heritage asset is accepted as part of a new development proposal local planning authorities should take all reasonable steps including planning obligations or condition to ensure the new development takes place.

#### The Setting of Heritage Assets

- 45. The aim of this guide is to interpret national planning guidance on the setting of heritage assets. It stats that the setting of an asset is wider than its curtilage, or the character of an area or even its context. The context being the relationship between the asset and other heritage assets which are relevant to its significance.
- 46. The document describes what it considers the setting is. Setting does not have a fixed boundary or be within a set distance of a heritage

- asset. Extensive heritage assets such has a historic park or conservation area can include many heritage assets all with their own settings as well as the overlapping setting of the larger asset. The contribution to setting is often expressed by reference to views the guidance states, and these views can incorporate views and or settings of other heritage assets.
- 47. Some heritage assets were designed to be seen such as a beacon or lighthouse or monument. Or specific views within a historic park designed to give glimpses of further parts of the landscape beyond or a specific feature.
- 48. However the guidance states that setting is not a heritage asset nor a designation. Its importance is how it contributes to the significance of the heritage asset. When assessing the setting of an asset planners need to assess whether cumulative change is a factor. Where past development may have affected the setting would a further development make this effect worse or have little further impact. Settings of heritage assets have also changed over time. A setting does not require public access for it to be important. Historic battle sites or other archaeological remnants may also have a setting even though nothing is visible above the surface.
- 49. The advice note then describes how to assess the impact of a development on a heritage setting. Step 1 identify which heritage assets and their settings are affected; step 2 assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s); step 3 assess the effects of the proposed development, whether beneficial or harmful, on that significance; step 4 explore the way to maximise enhancement and avoid or minimise harm; step 5 make and document the decision and monitor outcomes. The guidance then describes each of these steps in more detail.

Summary of all three guidance notes - implications for this Council

- 50. It is clear that if published English Heritage will follow their own advice in any comments they give or advice they provide in relation to planning applications and or appeals. Whilst the basic issues set out in the advice note will already be covered by officers when they are assessing applications which may affect heritage assets if all the steps in the advice notes are followed there may be implications for the speed in making planning decisions and providing pre-application advice. However, overall as the guidance relates to procedures and national guidance already in place there do not appear to be any significant points where the Council should register an objection to the consultation.
- 51. Cabinet is asked to delegate the response to the consultation to the Head of Sustainable Development. The response to the consultation will take into account any views of Cabinet. While the consultation

documents imply there may be an implication in workload for the Council's historic Buildings Officer and budgets if additional expert advice is needed it is considered that the implications of this can be considered as part of the Shared Service Review.

## Conclusion

52. Heritage is important to defining how the District looks today, has an important role in place shaping an identity, can have tourist/visitor value and is important to protect our heritage for future generations. The Strategy will be an important document in assisting the Council to meet these aims.

## Background Papers:

English Heritage advice notes – The Historic Environment in Local Plans, decision taking in the Historic Environment and The Setting of Heritage assets