



Historic England

# Neighbourhood Planning and the Historic Environment

Historic England Advice Note 11 (Second Edition)





# Summary

This advice note is written to help neighbourhood planning groups, local planning authorities and other stakeholders to explore the role of historic places and local history in preparing a neighbourhood plan.

It begins with the foundations of why you should consider the historic environment when preparing a plan ([section 1](#)), which culminates in a checklist of relevant issues to consider, followed by an overview of what this means in terms of evidence gathering ([section 2](#)).

Of course the historic environment is only one of the environmental issues to consider during plan preparation, alongside economic and social considerations. [Section 3](#) of this advice note focuses on translating evidence into policy, mindful of this bigger picture and including links between the different elements of sustainable development. It is complemented by case studies in this advice note and on Historic England's [website](#).

[Section 4](#) outlines the role and process of Strategic Environmental Assessment (SEA) and section 5 describes the role of Historic England in neighbourhood planning.

This advice note is supported by further information on Historic England's [website](#), including [information sheets](#) on policy issues such as site allocations, additional case studies, and links to other resources.

This document has been prepared by Guy Robinson informed and supported by colleagues within Historic England. This second edition takes account of changes in national planning policy and guidance since the first edition was published in late 2018, in particular those focused on non-designated heritage assets, accompanied by some factual updating and other minor editorial changes.

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Front cover: Bredon, West Midlands. Policy NP9 of the Bredon Parish Neighbourhood Plan 2016-2030 identifies certain buildings, boundary walls and other structures as being worthy of protection as non-designated heritage assets due to the important contribution that they make to the distinctive local character of the parish.  
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# 1

# Why you should consider the historic environment in a neighbourhood plan

## 1.1 What is the historic environment?

1. At the outset of work on a neighbourhood plan, to align with national and local policy and make the most of the opportunities available, it is important that the plan is informed by a suitably broad understanding of what is meant by the historic environment.
2. When thinking about local heritage, one may first think of the buildings or structures that are formally 'listed'. However, heritage assets include more than just buildings and monuments; they also include sites, places, areas or landscapes. The unifying factor is that the asset has a degree of significance that merits consideration in planning decisions.
3. The National Planning Policy Framework (NPPF) defines the historic environment in its Glossary as follows: "All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora."
4. The NPPF Glossary also defines terms such as heritage asset and significance – see Box 1. The NPPF sets national planning policy and requires plans to set out a positive strategy for the conservation and enjoyment of the historic environment, thereby helping all those who are involved in planning to recognise and seek to sustain the significance of individual heritage assets.





Figure 1  
A listed bandstand in Morrab Gardens, Penzance, a registered park  
© Victoria Thomson

## Box 1: Some useful definitions (from the NPPF Glossary)

### Conservation (for heritage policy)

The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

### Heritage asset

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. It includes designated heritage assets and assets identified by the local planning authority (including local listing)\*.

### Designated heritage asset:

A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

### Setting of a heritage asset

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

### Significance (for heritage policy)

The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

\* Refer to [sections 1.2](#) and [2.4](#) for opportunities to identify non-designated heritage assets in a neighbourhood plan

## 1.2 Designated and non-designated heritage assets

5. Heritage assets may be designated or non-designated. ‘Designated heritage assets’ are defined in the NPPF as being World Heritage Sites, scheduled monuments, listed buildings, protected wreck sites, registered parks and gardens, registered battlefields or conservation areas (all designated under provisions in legislation).
6. Not all assets are designated in the same way. For example, conservation areas are designated locally by the local planning authority, whereas the Secretary of State is responsible for designating listed buildings and scheduled monuments.
7. There are also sites, monuments, buildings, places, areas and landscapes that do not meet the criteria for formal designation but which are locally valued due to their heritage interest and merit consideration in planning. These are called non-designated heritage assets.
8. Non-designated heritage assets may be identified in a number of ways, through local heritage lists, the local plan, conservation area appraisals and reviews, and decision-making on planning applications, but importantly also through the development of neighbourhood plans.
9. Because neighbourhood plans may establish policies for the development and use of land in a neighbourhood, thus becoming part of the development plan for the area, they may also usefully include the development of a policy which sets out how proposals affecting non-designated heritage assets on a list will be considered, and consideration of which buildings and sites might merit inclusion on a local heritage list.
10. [Section 2.4](#) provides advice on preparing a list of non-designated heritage assets, supported by a supplementary information sheet on promoting the conservation of heritage assets that is available to download from Historic England’s [website](#). [Local Heritage Listing: Historic England Advice Note 7 \(2<sup>nd</sup> Edition\)](#) provides more detailed advice on preparing and maintaining local heritage lists.



### 1.3 Why is the historic environment important?

11. Heritage plays an important part in shaping how we perceive and experience a place. It is often a place's distinctive heritage that makes it special. That distinctiveness gives local people a sense of belonging or identity and a feeling of pride in a place. Also it can help to attract investment to an area.
12. Heritage supports the local economy by encouraging businesses to invest in the area and attracting visitors, and it raises the quality of design. Heritage supports local communities and provides space for business, community facilities and other activities. The fact that a large number of economic activities occur within it, are dependent on it or are attracted to it means that heritage can be used effectively when informed by and connected to wider plans for growth, which could present opportunities for regeneration through conservation. Relevant research on the role of heritage in the economy is available on the Heritage Counts [website](#).
13. When thinking about the role of heritage in the preparation of a neighbourhood plan, there are various aspects to consider.
14. Neighbourhood plans contain 'non-strategic' policies which should be used to set out more detailed policies for specific areas, neighbourhoods or types of development, such as policies that help to conserve and enhance the historic environment. At its simplest this might mean identifying the features of the area's historic environment that are valued by the local community and preparing policies to ensure the need for their conservation is given appropriate weight in decisions.
15. Whilst it can cover wider community aspirations, a neighbourhood plan should address the development and use of land and it could set requirements (e.g. for design or conservation) to make proposed development acceptable. Non-land use matters should be clearly identifiable eg through identifiable formatting changes or in a companion document or annex.
16. In addition to the conservation of assets, preparing a neighbourhood plan may also provide opportunities to repair, conserve or bring heritage assets back into use, especially those that are at risk. In this way, including heritage in a plan can not only help to conserve those areas which are valued locally but also ensure that they remain in productive use where appropriate.
17. Taking a positive approach helps to ensure the historic environment will continue to be valued and remain 'viable' for future generations, contributing to the sense of place and the viability and vitality of town and village centres.



18. To maximise the potential of local heritage, consider how objectives for the historic environment relate to a range of other national and local objectives for the area, ranging from building a strong, competitive economy and supporting the health and welfare of residents to requiring good design. This line of thinking applies to local plans and to neighbourhood plans.

Figure 2  
Newport Pagnell's Neighbourhood Plan allocated the former Aston Martin Motorcar Works site for housing development but also required the conservation and reuse of several historic factory buildings, including an unusual three-storey car factory building built in 1909 © Simon Peart, Milton Keynes Council



### Box 2: Integrating new development and encouraging locally distinctive design

As stated in the NPPF, planning policies should ensure that developments are sympathetic to local character and history, and establish or maintain a strong sense of place. Understanding and appreciating the local historic environment can help to ensure that potential new development is properly integrated with what is already there and does not result in the loss of local distinctiveness.

To inform this understanding, character assessment is an important tool to articulate what is distinctive about a place. Such assessment can also identify opportunities for improvement, informed by the local community's aspirations, and the challenges that will need to be faced. Character assessment is covered in more detail in [section 2.4](#) of this advice note.

Addressing how best to integrate new development into an existing place can encourage people to be innovative. Taking into account what is special about a place often demonstrates that off-the-shelf design and construction might not be appropriate. It encourages sensitive development of historic buildings and places that can invigorate an area, stimulating investment, entrepreneurship, tourism and employment.

## 1.4 Addressing heritage in the neighbourhood planning process

19. Whilst this advice note does not cover the neighbourhood planning process in general, a basic appreciation of that process is useful to highlight the different opportunities for considering heritage issues in plan-making.

20. Once the first steps have been taken (see [Box 3](#)) the early phase of work focuses on gathering evidence, canvassing views and exploring what the plan might cover. Establishing how this relates to the historic environment is an important element of this early phase.

21. As explained in [section 2](#), there are a range of actions that collectively will result in a robust, proportionate evidence base informing the heritage content in the plan. Regardless of how this is presented in the plan, it is important not to treat heritage in isolation and for the evidence to inform relevant sections and policies throughout the plan.

22. The effects of policies in the plan on cultural heritage may need to be assessed through Strategic Environmental Assessment. This is covered more in [section 4](#).

23. A draft plan must be subject to consultation before the plan is submitted to a local authority. Following submission the plan is assessed via independent examination and, subject to resulting modifications, the plan may then proceed to referendum.

24. Neighbourhood plans come into force immediately following a successful referendum. If the local planning authority subsequently decides not to make the plan, it ceases to be part of the development plan.

25. A neighbourhood plan must meet a number of basic conditions if it is to proceed to referendum. In particular, it must:

- Have regard to national policy
- Contribute to sustainable development
- Be in general conformity with the strategic policies in the Development Plan for the area
- Be compatible with EU obligations.

26. These basic conditions underpin much of the content in this advice note. More detail information on this process, including the Basic Conditions, is available in the [Locality Neighbourhood Planning Roadmap](#).

### Box 3: Where does heritage fit into the process?

#### First steps

including designating a neighbourhood plan area. It may be desirable to avoid splitting a designation (eg a registered park and garden) with an administrative boundary which may result in two different management regimes.



#### Evidence gathering

including on heritage, making use of existing records, undertaking additional evidence gathering as needed and identifying the issues affecting the historic environment



#### Plan preparation

##### Prepare draft plan

including consideration of the role of heritage as appropriate, informed by informal engagement and formal consultation on a draft plan

##### Strategic Environmental Assessment

if required, including consideration of the effects of the plan on cultural heritage

##### Prepare submission plan

taking account of feedback from formal consultation and informed by the SEA



#### Submission



#### Examination



#### Referendum

## 1.5 Help with neighbourhood planning

27. Guidance on the breadth of issues involved in neighbourhood planning is available from the Government's Planning Practice Guidance (PPG) and from organisations such as [Locality](#) and [RTPI/Planning Aid](#).

28. Contact between neighbourhood planning groups and the local authority's planning service is important from an early stage, not least to enable groups to scope issues and understand how the local authority can help. A local authority's neighbourhood planning liaison officer (if such a post is in place) is likely to be a first port of call. Groups are also advised to seek input from their local authority's conservation officer and archaeological adviser (which in some cases is the County Archaeologist). Information held by the local authority and used in the preparation of its local plan is often the starting point for neighbourhood plans and is often available to download from the local authority's website.

29. Support from external heritage specialists may also be required, noting the resource constraints within which all local authorities operate. External support may particularly be valuable when one needs to identify where the significance lies and its sensitivity to change, which can unlock viable uses for an asset and secure its long-term future. Historic England's experience has shown that when communities are considering the allocation of sites and need to consider the impact on heritage assets on- and off-site, many struggle to assess significance without appropriate specialist advice.

30. [Managing Significance in Decision Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2](#) includes more information on finding such expertise. This includes, for example, links to a register of suitably experienced heritage consultants maintained by the [Institute of Historic Building Conservation](#) (IHBC) and a register maintained by the [Chartered Institute for Archaeologists](#) (CIfA).

31. Other useful information may be available from local environmental and amenity groups, civic groups, building preservation trusts, local history groups and other local experts. Such local knowledge can strengthen the evidence base prepared, using insights that may not be available to those who do not know the area so well.

32. Historic England's role is explained further in [section 5](#) and on its [website](#).

33. [Box 4](#) includes a checklist to provide a broad overview of key steps when covering the historic environment in plan preparation.



## Box 4: Historic environment checklist for neighbourhood planning groups

Informed by the Basic Conditions (see [section 1.4](#)), the following checklist provides guidance on making the most of heritage in a neighbourhood plan. It summarises some of the key points explored in this advice note and in related information on Historic England's website on neighbourhood planning and the historic environment.

1. Have you made contact with your local authority historic environment advisers (eg conservation officer and archaeological adviser) and the person at your local planning authority responsible for neighbourhood plans? (see [section 1.5](#))
2. What heritage assets does your neighbourhood plan area contain and where are they located? Refer to the National Heritage List for England and your local Historic Environment Record. Note that assets do not need to be protected by designation to be of interest (see [section 1.2](#))
3. What condition are the heritage assets you have identified in and how might their significance be vulnerable to change? (see sections [2.3](#) and [2.4](#))
4. Do you know what the community values or would like to improve in their local area? (see sections [2.1](#) and [2.2](#)).
5. Informed by the aspirations of your local community and the evidence gathered, does the plan have a clear vision for the historic environment and does that vision align with the strategic policies for your area? (see sections [1.4](#) and [3.2](#))
6. How can your historic environment be used to help achieve your overall goals for sustainable development, without repeating strategic policy? (see sections [3.2](#) and [3.3](#) and [Box 5](#))
7. What are the opportunities for conserving or improving the heritage of your neighbourhood, or for developing a better understanding or appreciation of it?(see [section 3.3](#))
8. Have you considered local characteristics as part of your design policies and how new development can be made locally distinctive? (see sections [2.3](#) and [3.3](#)).
9. What impact will your Plan proposals have on heritage assets or their settings or the local character? If you plan to allocate sites more detailed impact assessments are usually needed (see [section 3.3](#)). Is Strategic Environmental Assessment needed? (see [section 4](#))

10. Have you consulted Historic England’s [‘Heritage at Risk Register’](#) or any risk register held by your local authority? Can your plan proposals make any use of heritage assets on these registers? (see [section 2.3](#))
11. Have you found out if there is a Conservation Area Appraisal or Management Plan associated with a conservation area in your neighbourhood and, if so, what are its implications and does it need to be updated? (see [section 2.3](#))
12. Have you consulted Historic England where you consider our interests to be affected? More information on consulting Historic England is available on [Historic England’s website](#). Note that you should also consult Historic England on all Neighbourhood Development Orders and Community Right to Build Orders (also see [section 5](#)).

# 2

## Understanding the historic environment in a neighbourhood plan area

### 2.1 Community engagement

**34.** It is important to fully understand what it is the community values or would like to improve about its local area. Community consultation not only provides a way to identify heritage issues for the plan to address, it also encourages participation. Using local people's interest in the history of their area is invaluable and can galvanise support for the plan-making process. Each step to promote active engagement in the identified issues helps to maintain interest and support for the plan (and its agenda or policies) as it progresses.

**35.** An initial consultation exercise could ask residents and local businesses, amongst other things, to identify a feature of the area that should be given particular consideration for conservation in decision-making, or to identify an issue they feel has detracted from the area's historic character in the recent past. In other words, find out what old places or buildings in the area residents and other stakeholders like (or do not like) and why? It will be important to ensure that this early engagement reaches those who own or manage existing heritage assets in a plan area to take account of their position and ideas.

**36.** Early engagement is required to ensure that the wider community is kept fully informed of what is being proposed and has opportunities to be actively involved in shaping the emerging plan. More formal consultation comes later when a complete, draft plan has been prepared that includes only preferred policies rather than a range of policy options.

## 2.2 Building a proportionate, robust evidence base

37. The most effective plans are those which are built from robust evidence. There is no ‘tick box’ list of evidence for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. In effect this means the evidence needed will depend on what those preparing the neighbourhood plan want it to do.

38. For example, if writing a policy to ensure the design of new development will protect local distinctiveness, it is likely that further evidence will be needed, specifically a study that defines positive local characteristics of existing development design and form, such as the heights of buildings, roof shapes, windows, materials and other architectural details.

39. Whereas more site specific policies, such as site allocations or policies that help to protect locally-valued heritage assets, may require more detailed assessments or a review of proposed heritage assets against locally-derived criteria.

40. The PPG offers further insight on what a proportionate level of evidence means in practice, requiring that neighbourhood plans, where relevant, include “enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale”.

41. The same section of the PPG continues by stating that: “It is beneficial for any designated and non-designated heritage assets within the plan area to be clearly identified at the start of the plan-making process so they can be appropriately taken into account.” It is important not to overlook sites of archaeological interest when identifying heritage assets as described in the PPG (see [section 2.3](#) for advice on how this is done).

42. Set in this context, before determining exactly what plan policies will do, it is helpful to gather some basic information about the local historic environment and any heritage issues or opportunities that the plan might address. This will inform the choices made about more detailed evidence requirements.

43. Collating a broad data set would be especially useful if the impacts of proposed policies need to be assessed via Strategic Environmental Assessment (SEA) – see [section 4](#) of this advice note for more on SEA.

## 2.3 Using existing sources of information

44. This section outlines some of the existing sources of information that may be available when collating information on the local historic environment.



45. Many neighbourhood plan groups start such work by constructing a list of all the designated heritage assets in their area. The [National Heritage List for England](#) (NHLE) provides descriptions of all nationally designated heritage assets, though it should be noted that descriptions on the NHLE vary in their thoroughness with only the most recent providing analysis of each asset's significance.
46. The local authority's website is also an important reference and starting point when collating evidence to inform a neighbourhood plan, drawing as appropriate from the evidence base supporting the local plan. For example, information on socio-economic factors for the area can inform and stimulate policy discussions in a neighbourhood plan, reviewing how a place has evolved, how local heritage is being used, and how future growth might be most effectively supported.
47. Many local authorities hold a [local list](#) of non-designated buildings or places with heritage interest in their area, prepared using selection criteria. The local planning department should be able to provide details of the records they hold.
48. One way to enhance this approach is to prepare a map that shows where designated and/or non-designated heritage assets are, as well as any issues they face. This may be especially helpful if the plan's spatial strategy needs to respond to heritage issues or opportunities in a particular way. For example, if an access road for a proposed development site would run through a tranquil conservation area, this may have an impact on a valued feature of the area. In such a case, can appropriate mitigation measures be achieved, or an alternative access route provided, or is an alternative site is more appropriate?
49. An area's archaeological potential should be assessed by consulting the local Historic Environment Record (HER), as well as historical maps of the area. This can help to identify any non-designated heritage assets that could be affected by plan policies (including indirectly by effects on setting or viability). The HER is normally maintained by the County Council or local planning authority and will have historic mapping in its collections. To explore the HER contact the relevant local Historic Environment Record Officer (HERO) (their contact details are available at the Association of Local Government Archaeologists [website](#)) or visit the Heritage Gateway.
50. [The Heritage Gateway](#) gives remote access to many local HERs for information on historic buildings, archaeological sites and other features, although the information provided is only a summary of what is recorded by the HER. Other HERs may have their own online search facilities (search online using the County, City or Unitary Authority name and 'Historic Environment Record' for details).

- 51. Historic Landscape Characterisation** is a long-established method, informed by modern and historic maps or aerial photographs, which helps one to see the bigger picture of the historic environment as a whole. Related data are available on a countywide scale from the local HER, which can provide a useful starting point by providing previously identified character areas and information about their past and present characteristics. Those preparing a plan will need to make their own judgements about which of these are most valued, however, before focusing on character on a more local level.
- 52. Extensive urban surveys (EUSs)** are county-by-county surveys of the smaller towns of England. The early surveys focussed mainly on below-ground archaeological remains. Since about 2000, projects have included a strong characterisation element. For the towns selected for study, each project results in an assessment report that is available through the [Archaeology Data Service](#), summarising the town's archaeology (including the potential for the survival of previously unidentified sites of archaeological interest), historical development and historic environment.
- 53. Conservation Area Appraisals and Management Plans** provide another valuable resource (for areas that include a conservation area). An appraisal normally defines the area's special interest, identifies positive features of character or appearance and identifies any issues that are opportunities to enhance the area.
- 54.** The Historic England [Heritage at Risk Register](#) records designated heritage assets that are considered to be 'at risk'. It can be used to identify if there are any heritage assets at risk in a neighbourhood plan area and inform discussions on steps that may be taken to bring the asset(s) off that Register and into more sustainable use. Note that the Register does not include Grade II listed buildings or non-designated heritage assets; however, (though not required) a local authority may maintain its own buildings at risk register, even if only informally.
- 55. Heritage Counts** is the annual survey of the state of England's historic environment. It contains information about the wider social, economic and environmental benefits that heritage provides that can be applied to a neighbourhood plan.
- 56.** In addition, a range of other documents is available from Historic England covering subjects that include [planning](#), regeneration, places of worship and heritage crime, amongst others. This advice note forms part of a series of [Historic England advice notes](#) (HEANs) that contain detailed, practical advice on how to implement national planning policy and guidance. We have also produced [Good Practice Advice](#) (GPA) notes, which include notes on local plan making, managing significance, and setting and views.

## 2.4 Additional evidence gathering

57. If the information available is insufficient, there is a range of further actions that may be undertaken, noting that the more specific and detailed a policy, the more detailed the evidence base needs to be. Actions that may be considered include:

- 1 Character assessment
- 2 Preparing a list of non-designated heritage assets
- 3 Assessing the significance of heritage assets
- 4 Undertaking a local building at risk survey
- 5 Undertaking a desk-based archaeological assessment
- 6 Gathering evidence on a conservation area.

### Box 5: A tool to inform evidence gathering

Identify the heritage assets in your neighbourhood	<ul style="list-style-type: none"><li>■ List and, if appropriate, map the designated assets in your area from the National Heritage List for England</li><li>■ Are any of the assets on the Heritage At Risk Register?</li><li>■ Review the local authority website for data on heritage assets and find out if the authority has a local list</li><li>■ Review the Historic Environment Record (HER) to assess an area's archaeological potential</li></ul>
Are you proposing new development in your neighbourhood?	<ul style="list-style-type: none"><li>■ Assess the significance of heritage assets that may be affected</li><li>■ Undertake a desk-based archaeological assessment (especially for site allocations)</li></ul>
If you wish to promote local character in your Plan....	<ul style="list-style-type: none"><li>■ Undertake a character assessment to inform your design policy</li></ul>
Do you have a conservation area in your neighbourhood?	<ul style="list-style-type: none"><li>■ Gather evidence on the conservation area in discussion with your local authority</li></ul>
Identify the buildings and places valued by your local community. Are any assets at risk?	<ul style="list-style-type: none"><li>■ Prepare a list of non-designated heritage assets</li><li>■ Undertake a local building at risk survey</li></ul>

## Character assessment

58. The importance of design in supporting sustainable development is reflected in the [NPPF](#), the [National Design Guide](#), and the [National Model Design Code](#), all of which emphasise high quality design generally, and design codes specifically. As stated in a report from the [Building Better, Building Beautiful Commission](#), “What people want is buildings that reflect the history, character and identity of their community and that belong in their surroundings: somewhere, not anywhere.”

59. Character assessment is an area- or place-based assessment that sets out the area’s defining positive characteristics as well as identifying the features that contribute to local distinctiveness. It can be an important building block in a plan’s evidence base, particularly if the plan is expected to include policies that inform the design of new development. There is a range of sources of advice on preparing a character assessment, depending on how much detail is required, the type of place and the types of policy that are envisaged. Some of these sources are outlined below. For more detailed advice on ways in which locally distinctive development can be promoted, refer to a supplementary information sheet on [identifying and promoting local character](#).

60. In terms of sources of guidance specifically designed for community use, "Your Place Matters" contains a [Community Planning Toolkit](#) that Historic England has published jointly with Worcestershire County Council; it assists particularly communities in rural areas and has been used extensively in the West Midlands. The [Oxford Character Assessment Toolkit](#) has now been used for a number of large neighbourhood plan character studies in suburban areas and conservation areas. [Know Your Place](#) and the [Our Place](#) toolkit are other options that work especially well at the street level. Links to these resources are also included on Historic England’s [website](#).

Figure 3  
What does the evidence tell us? Roundtable discussions on the local historic environment  
© Historic England





Figure 4  
Denstone, West Midlands.  
The Denstone  
Neighbourhood Plan  
recognised the importance  
of the local historic  
environment and the need  
to retain and enhance  
heritage assets and  
Denstone's sense of place.  
The Plan emphasised  
the conservation of local  
distinctiveness and the  
protection of locally  
significant buildings  
and landscape character  
including archaeological  
remains and important  
views.



**61.** Section 2 of the [National Model Design Code](#) includes advice on identifying area types for neighbourhood planning groups who wish to produce their own design codes or guides as part of the neighbourhood plan process.

**62.** Historic England produces guidance on [Historic Area Assessment \(HAA\)](#), which involves making a more detailed study of an area than character assessment. HAA could be done as a follow-on to character assessment in a part of an area subject to particular pressure for development or specially sensitive to the effects of change. HAAs typically give insights into how and why a place has come to look the way it does. They identify the range of landscapes and building types, their dates and forms, and relate them to the wider evolution of the area. They can identify whether individual buildings or places are subject to issues, as well as noting opportunities for enhancement. HAAs can be used to identify archaeological sites.

**63.** Landscape Character Assessment (including assessment of landscape sensitivity) would be needed if development is proposed (in plan-making) that incorporates assessment of major expansion options, or where developments could affect a highly sensitive landscape, such as an Area of Outstanding Natural Beauty.

### **Preparing a list of non-designated heritage assets**

**64.** Independent (at least initially) of any local list endorsed or developed by a local planning authority, neighbourhood planning groups may wish to consider if any buildings and spaces of heritage interest are worthy of protection through preparing a list of non-designated heritage assets that is referenced in neighbourhood plan policy. The use of selection criteria is important to provide robust processes and procedures against which assets can be nominated and their suitability assessed for addition to the local planning authority's heritage list. The consultation and examination processes confirm the suitability of features for inclusion in a list of non-designated heritage assets, which can be integrated within a local list maintained by the local authority, subject to discussion with them.

65. Where a community group is creating the list, this will need to be signed off by the group itself prior to being adopted by the local authority concerned, in order for it to be given proper weight in planning decisions: formal ratification ensures public confidence and maximises the influence of the local heritage list as a material consideration. Where a Parish or Town Council or Neighbourhood Forum is preparing a local list for a Neighbourhood Plan, the local planning authority's agreement to the local list is not needed, but the local planning authority will be an important stakeholder at the examination stage, and will be the body responsible for deciding whether to accept the examiner's recommendations, whether to take the plan to referendum and, ultimately, whether it should be made. As such it is sensible to work closely with the local planning authority's heritage advisers, who will also be responsible for informing the council's decisions affecting the locally listed assets.

66. [Local Heritage Listing: Historic England Advice Note 7 \(2<sup>nd</sup> edition\)](#) provides further information on preparing a local heritage list as part of the Neighbourhood Planning process.

67. An [information sheet](#) on promoting the conservation of assets is available on Historic England's website.

### Assessing the significance of heritage assets

68. When writing a neighbourhood plan that promotes new development, it is important to have a clear understanding of the significance of heritage assets that could be affected by the proposals – not only those on-site (ie directly linked with a proposal) but also assets that are 'off-site' and whose setting may be affected.

69. This does not mean that neighbourhood planning groups will need to identify and assess the significance of all the heritage assets in their plan area. The focus of such work will tend to be on any proposed allocations or development and their relationship with identified heritage assets, and the level of detail applied should be proportionate. If the significance of the assets – and the impact on that significance – are high, then much more information may be necessary than otherwise would be the case, to ensure that well informed choices are made.

70. When assessing the significance of a heritage asset, examine the asset and its setting, check key sources of information and consider if expert assessment is required – see Box 6 for more information and refer to Historic England's [Conservation Principles](#) to learn more about the underlying context and rationale for assessing significance.

## Box 6: Assessing the significance of a heritage asset

### 1 Examine the asset and its setting

The NPPF defines significance in terms of an asset's value to this and future generations because of its heritage interest. For example, does it contribute to the architectural or artistic interest of the place? Is it an important symbol of the community's historic identity? Historic England's [guidance on Historic Area Assessments](#) (see in particular paragraph 2.6.8) includes some useful examples of the sorts of questions one needs to answer when judging the significance of any given area or group of heritage assets. More information on significance is available in [Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2](#).

Setting must also be considered. Its importance, as stated in [The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning: 3 \(2nd Edition\)](#), "...lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance." An asset's setting may evolve over time and the potential for appreciation of the asset's significance may increase once it is interpreted or mediated in some way, or if access to currently inaccessible land becomes possible.

### 2 Check key sources of information (also see [section 2.3](#))

Sources include the Local Plan, evidence base and policies, the main local, county and national records including the HER, statutory (these can be accessed via the National Heritage List for England) and local lists, the [Heritage Gateway](#), the Historic England Archive, and other relevant sources of information such as historic maps, conservation area appraisals, townscapes studies or the urban archaeology database.

### 3 Is expert assessment required?

Consider if the nature of the significance of the affected assets requires an expert assessment to gain the necessary level of understanding. In Historic England's experience appropriate specialist advice may be particularly useful in considering the setting of a heritage asset ie 'offsite' impacts on setting. Note that where there is archaeological interest (including buildings, areas and wreck sites), a desk-based assessment (DBA) may be appropriate to understand the significance of the affected assets. It is good practice to use professionally accredited experts when preparing a desk-based assessment and to comply with relevant standards and guidance. The DBA may conclude that further archaeological fieldwork is needed to make an informed decision.

**71.** Understanding the significance of affected assets and the impact of the proposed development on that significance enables those preparing a neighbourhood plan to:

- Avoid, minimise and mitigate impact through neighbourhood planning policy criteria in a way that meets the objectives and policies of the NPPF
- Look for opportunities to better reveal or enhance significance as part of the approach to the development
- Justify any harmful impacts in terms of the public benefit from the development, mindful of conserving significance and the need for change
- If the harm has been justified, offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

### **Undertaking a local building at risk survey**

**72.** A neighbourhood plan should address the needs of heritage assets most at risk of decay, neglect or other threats. Consulting the national [Heritage at Risk Register](#) may give some information about what assets have previously been identified as at risk but this survey does not include information on Grade II listed buildings (which make up 93% of all listed buildings) and may be only a partial survey in other areas.

**73.** In addition to finding out about what people value locally, one may wish to undertake a local building at risk survey to inform the plan.

**74.** Making a detailed survey of every listed building in an area may require more resource than is available. However, undertaking a rapid walk-past survey, perhaps concentrating time on Grade II, local lists and buildings in conservation areas, is likely to identify any priority cases for recording. An initial assessment is likely to be sufficient for many local historic buildings to inform a general plan policy, only proceeding to full assessment if the condition of the building is very bad and justifies a policy relating directly to it.

**75.** Historic England has provided basic information on [how to assess the condition of historic buildings](#) on its website, looking in turn at each of the main building elements.



**76.** If an assessment concludes that the overall condition is poor or very bad, more detailed information can usefully be recorded:

- On the condition of the building
- What is expected to happen to the building's condition (ie is the trend improving, stable, declining or unknown) based on local knowledge and information gathered
- The owner type (the person/body responsible for the building/ structure's repair).

**77.** An example of how this information might be presented is the [Heritage at Risk Register](#).

### **Undertaking a desk-based archaeological assessment**

**78.** An archaeological statement would usually present an overview of the area's prehistory, history and archaeological potential. It does not necessarily need to be a standalone document and can, for example, be integrated within a heritage topic paper or wider site assessment.

**79.** Archaeological assessment involves using records, archive resources and published sources (books) to understand the potential of land to produce evidence of past human activity and predicts how important that evidence might be. It does not normally require undertaking field survey beyond a visual assessment of the land.

**80.** The archaeological potential of the land will be assessed based on previous finds within the land and its surroundings, as well as understanding of the development of land use in the area. The likely importance of any remains is determined by considering the likely nature, extent and completeness of any remains using similar criteria to other heritage assets. The published [Regional Research Agendas](#) provide a helpful starting point for considering the academic value that archaeological remains might have, although it may be appropriate also to consider if remains have particular local interest to the community and educational value.

**81.** Whilst remains of national importance would be expected to receive the same level of protection in planning decisions as scheduled monuments (refer to the [NPPF](#) for more information), one should also consider locally and regionally important archaeological remains as heritage assets, which should be conserved in a manner appropriate to their significance. Decision-making, with reference to the neighbourhood plan, should seek to avoid or minimise conflicts with the conservation of such assets, taking any loss to their significance into consideration when assessing the suitability of proposals for change.

**82.** Whilst it is important to refer to the HER as a key resource for all plans, a detailed archaeological assessment is less commonly required as evidence for a neighbourhood plan. A detailed archaeological assessment is only likely to be required during a site allocation process to determine, potentially with the aid of fieldwork, if there is high potential for (below ground) archaeological remains and it is necessary to demonstrate that a proposed development site is deliverable, or when groups wish to add to a list of non-designated heritage assets.

**83.** Neighbourhood planning groups do not need to survey the whole plan area when doing a more detailed archaeological assessment; however, they would need to assess not only the sites proposed for allocation (including the sites rejected) but also the settings of identified heritage assets that may be impacted by the proposed development. [Site allocations in local plans: Historic England Advice Note 3](#) provides more guidance on site allocations.

### **Gathering evidence on a conservation area**

**84.** Neighbourhood planning groups may wish to propose reviewing the boundary of a conservation area in their neighbourhood or seek to develop conservation area management proposals with the local planning authority.

**85.** If this is desirable, a first step would be to contact the local authority to find out if they have prepared a conservation area appraisal or management plan. If there isn't one, or it is out of date, this could be prepared or updated as part of plan-making and inform one or more of the policies drafted.

**86.** Depending on the resources and expertise available, and bearing in mind the need for all such work to be proportionate to the significance of the historic area and the threat to it, neighbourhood planning groups may need to commission a qualified heritage consultant to deliver the appraisal (having discussed this with the local authority). Such an appraisal can also help to inform the content of the Local Plan as well as be a material consideration in related planning decisions. Should groups decide to prepare a conservation area appraisal, and to make best use of the work done, it is sensible to confer with the relevant local authority about the process that would lead to endorsement of the appraisal.

## 2.5 What next?

**87.** There are various ways in which the evidence gathered on heritage may be presented. Neighbourhood planning groups may prepare specific site assessments that cover the historic environment. Alternatively, or in addition, more general information may be collated in a topic paper on heritage.

**88.** As the evidence base is developed, those preparing a plan can start to explore policy options informed by what the evidence reveals. For example, the evidence gathered might lead neighbourhood planning groups to think about:

- Small scale improvements to the neighbourhood to enhance the appearance of the streets and public spaces, including improved access for all
- Preparing guidance on the design of new development where it may affect a place's character, including specifying what mix of materials, scale, landscape and layout may be required to protect local distinctiveness
- Encouraging investment and enhancement of particular buildings and spaces especially those that are at risk.

**89.** The next section explores policy writing in more detail, supported by information sheets that are available to download from Historic England's [website](#).

**90.** Bear in mind that the neighbourhood plan policies may not be the most appropriate way to take all of these actions forward. The relevant local authority can advise further on what might be included in an implementation plan or list of aspirations as an appendix to the plan.

# 3

## Translating evidence into policy

### 3.1 Why policies are important

**91.** Development decisions in the neighbourhood are made in accordance with the development plan unless 'material considerations' suggest otherwise. Material considerations are those that are relevant to planning and the development proposed; examples may include the NPPF, appeal decisions and case law.

**92.** The development plan for an area comprises the combination of strategic and non-strategic policies which are in force at a particular time. This includes policies in an adopted local plan for that area (including any 'saved policies' carried over from a previous plan adopted by the local authority) and policies in any neighbourhood plans that cover the area and have been made or are recommended to proceed to referendum.

**93.** Policies in a neighbourhood plan must align with strategic policies for that neighbourhood. When they are brought into force, they take precedence over existing non-strategic policies in a local plan (unless they are themselves superseded by a more up-to-date policy).

**94.** When decisions are made the formal policies in the plan are given greater weight than any supporting text or diagrams.

### 3.2 Policy development

**95.** The policies in a neighbourhood plan should be focused to deliver the vision for the plan area. This is based on an understanding of the plan area and its needs (informed by community consultation), articulating how sustainable development will be delivered over the plan period.

**96.** The plan may contain a mixture of general policies, setting broad principles to be applied across all or part of the area, and more focused, site specific or thematic policies, possibly relating to a single type of heritage asset (such as historic agricultural or industrial buildings). As stated in the Basic Conditions (see [section 1.4](#)) the policies must conform to the strategic policies for the area. They should not reproduce what is already covered in the local plan.

97. The NPPF states that plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.

98. The PPG provides guidance on the content of neighbourhood plan policies as follows: “A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”

99. Box 7 offers some tips on policy writing, focusing in particular on heritage-related policies.

### Box 7: Tips on policy writing

The Basic Conditions (see [section 1.4](#) of this advice note) set the foundations for neighbourhood plan-making. Note the importance of tailoring neighbourhood plan policy to the local context, which will help to avoid repeating strategic policy. Additional questions that may be considered include:

- When or where should this policy be applied?
- Will there be any exemptions to the policy? If so, in what circumstances?
- How rigorously will it be applied?
- What will applicants need to do?
- What will the decision-taker need to know and take into account?

So, if a policy is intended to apply to proposals for all new development, the policy is likely to refer to all new development. But it may only apply in certain circumstances, in which case those circumstances should be made clear in the policy, as should any exemptions.

Policies can offer a degree of flexibility, whereby they encourage or discourage an applicant to do something. Where exceptions would only be acceptable under specific circumstances, such as the fulfilment of measures to avoid or minimise harm to a heritage asset, these should be clearly set out in the policy. Alternatively, if a preferred course of action is clear and the supporting evidence is sufficiently robust, the policy can set an approach whereby a proposal must comply with the policy or an element of it.



For example, a policy could require an applicant to do one or more of the following as part of a development proposal (the action(s) specified will vary from policy to policy – there is no ‘one size fits all’ approach):

- Provide information about an asset’s significance (for example, by undertaking pre-application investigation and assessment)
- Demonstrate that they have avoided or minimised harm to the significance of an asset through the design of the development
- Conserve the asset or a particular part of it that could be threatened, for example where it could be harmed by an otherwise acceptable development within a site allocation
- Conserve the asset’s setting or an aspect of it that contributes to its significance
- Undertake repair and conservation work to an asset
- Include elements of design or promotional material to enhance enjoyment of the historic environment.

For further information, also refer to [The Historic Environment in Local Plans: Historic Environment Good Practice Advice in Planning: 1](#) and [The Historic Environment and Site Allocations in Local Plans: Historic England Advice Note 3](#).

**100.** It is for the local community to decide on the scope and content of a neighbourhood plan. They may wish to set out a specific historic environment section within the plan, drawing on the evidence gathered. There are benefits from consolidating related information in a clear, focused way.

**101.** That said, it is important not to treat heritage in isolation, but consider how policies for housing and economic development, transport, community infrastructure and other facets of the environment could affect conservation of heritage assets or benefit by making better use of their special qualities. This might include appropriate guidance to avoid or minimise harm and capitalise on opportunities for heritage benefits.

**102.** The evidence gathered on what people value about the area, the condition of its historic buildings, the neighbourhood’s character and its archaeological potential, contributes to the direction taken when writing the neighbourhood plan. Work on the underlying evidence base will help to establish a clear vision for the historic environment and to appreciate the key conservation issues affecting the plan area.

### 3.3 Identifying opportunities

**103.** Neighbourhood plans should support the strategic development needs set out in Local Plans, which will take into account a range of objectives such as conservation and enhancement of the natural, built and historic environment, place-making, economic growth, housing and health and well-being. Enhancing an area and conserving its heritage can contribute towards these objectives in various ways.

**104.** Conservation of the historic environment often presents opportunities to improve the attractiveness of an area for the community, business and visitors. When understanding of local character is used successfully it can help to inform the design of new buildings and spaces which in turn can stimulate economic development, with the potential to influence the viability of town, village and other local centres. In this way a neighbourhood plan can positively support local plan objectives on tourism and employment.

**105.** Focusing on living more sustainably, neighbourhood plan policies can seek to address climate change issues, such as by encouraging improvements to the energy efficiency of historic buildings, whilst conserving heritage significance, where local plan policies are missing (also see information sheet 3 as referenced in paragraph 107 below).

**106.** Furthermore, a neighbourhood plan might seek to ensure that when development takes place it contributes to the renovation (and beneficial reuse) of historic buildings that would be affected; or the location and quality of new development enhances physical or visual access to a heritage asset for local people.

#### Exploring the opportunities in more detail

**107.** When preparing this advice note, several areas of policy development were identified where more detailed guidance may prove particularly helpful. Historic England's [website](#) includes links to downloadable information sheets on the following four aspects:

- Information sheet 1: Identifying and promoting local character
- Information sheet 2: Promoting the conservation of heritage assets
- Information sheet 3: Integrating heritage into wider agendas
- Information sheet 4: Site allocations.

**108.** Of these, the consideration of the historic environment during site allocations presents particularly important challenges to get right. In most cases a successful assessment is likely to be dependent on appropriate heritage expertise. As stated in [The Historic Environment and Site Allocations in Local Plans: Historic England Advice Note 3](#) (which is relevant to neighbourhood plans too, as both form part of the development plan): “A positive strategy for the historic environment in Local Plans can ensure that site allocations avoid harming the significance of both designated and non-designated heritage assets, including effects on their setting.”

**109.** Box 8 presents a selection of case studies, showing how some neighbourhood planning groups have tackled these issues in ‘made’ neighbourhood plans. More case studies with direct weblinks are included on Historic England’s [website](#).

### Box 8: Case studies

These six case studies from ‘made’ neighbourhood plans give a glimpse into the range of approaches taken across the country. Hyperlinks are included where possible. More case studies are included on the Historic England [website](#).

#### [Denstone Neighbourhood Development Plan](#)

Historic England particularly commended the use of historic characterisation when developing this neighbourhood plan. The Plan recognises the importance of the local historic environment and the need to retain and enhance heritage assets and Denstone’s sense of place, both of which contribute to the well-being of the community. The emphasis on the conservation of local distinctiveness and the protection of locally significant buildings and landscape character including archaeological remains and important views is equally to be applauded.

#### [Odiham and North Warnborough \(ONWARD\) Neighbourhood Plan 2014-2032](#)

This neighbourhood plan steering group brought design guidance set out in conservation area appraisals into the plan as dedicated design policies for each area. These were rephrased to provide robust design principles for applicants and decision makers to guide proposals in each area. Matters covered included the suitability of particular materials, set-back of buildings from road frontages, boundary treatments and the desired scale and form

of new buildings. Similar requirements were set out for individual site allocations. The neighbourhood plan examiner described the approach as “exemplary”.

### [Milland Neighbourhood Development Plan 2016-2030](#)

Milland is a rural parish in West Sussex with a ‘dispersed’ pattern of settlement common in many parts of South East England. The authors of the neighbourhood plan wanted to identify non-designated heritage assets across the plan area. Their list is divided into several categories: landscapes worthy of protection, cottages and houses including estate cottages, hamlets, other sites and cart ponds. Within these categories they identify 27 sites or places, which included not only historic residential buildings but also archaeological remains and structures used to manage waterpower for the area’s historic ironworking industry. The categories and resultant list of non-designated heritage assets protected by the plan stands out for the way it responds to the local distinctiveness of the parish, as well as helping to raise awareness of its history and archaeological interest.

### [Bredon Parish Neighbourhood Plan 2016-2030](#)

Policy NP9 of this neighbourhood plan focuses on local heritage assets and identifies certain buildings, boundary walls and other structures (referenced in an appendix) as being worthy of protection as non-designated heritage assets due to the important contribution that they make to the distinctive local character of the parish. In parallel with the policy, the Parish Council proposed that these buildings and structures are considered by Wychavon District Council for inclusion in the Local List, though the neighbourhood plan makes clear that inclusion of any building or structure on the Local List is not necessary for the application of policy NP9.

### [Newport Pagnell Neighbourhood Plan](#)

The former site of the Aston Martin Car Factory (founded as Salmon’s Coachworks in 1830) had become too small for its historic use of car manufacturing and was considered suitable for redevelopment to meet the town’s housing need. Whilst many of the factory buildings were not considered to be of particular historic or architectural interest, a small number, including a three storey factory building of 1910, were identified as positive buildings that were at risk due to ongoing lack of use and development pressure.

The neighbourhood plan identified these as locally important historic buildings and included a policy requiring policies for new development to retain these structures and, to make sure they were not neglected within a larger development scheme, to ensure they were made ready before 50% of any housing permitted was occupied.

This provides a strong incentive for a developer to take care of these buildings but also ensure they will continue to serve a purpose whilst providing evidence of the town's proud manufacturing heritage.

### Lavant Neighbourhood Development Plan 2016-2031

In Lavant Neighbourhood Development Plan 2016-2031, a site containing part of the Iron Age Chichester Entrenchments (an extensive monument dating from the 1st century BC) was identified as desirable to allocate to meet the village's housing need. Whilst the earthworks (designated as a scheduled monument) would not be directly affected by the development, there was potential that related archaeological remains might be located elsewhere in the site.

A criterion was added to the site allocation policy during examination, requiring that any application should be informed by a programme of archaeological survey and investigation agreed by the council's archaeological advisor and that the development be designed to preserve any remains of national significance in situ.

The policy also required proposal to include a robust justification for the loss of any remains that couldn't be avoided. An additional clause required the creation of views from the earthwork to the 'Trundle', a large Iron Age hillfort located a few kilometres to the north east.



# 4

## Strategic Environmental Assessment (SEA)

**110.** A Strategic Environmental Assessment (SEA) is used to assess the impact a land use plan may have on the environment. SEA originates from the Strategic Environmental Assessment Directive, brought into UK Law by the Environmental Assessment of Plans and Programmes Regulations (2004). This identifies cultural heritage (which includes archaeological, built and landscape heritage) as an issue that should be considered.

**111.** If the neighbourhood plan could have effects on archaeological, built and landscape heritage which will influence the choices of plan options, it is likely that an SEA will be required to demonstrate that these choices have been made in a consistent manner.

**112.** Where it is necessary, completing an SEA forms one of the basic conditions against which an examiner will test the plan.

**113.** Where a local authority considers that a SEA is required, they have a duty to consult Historic England on its scope and content.

### 4.1 When is SEA needed?

**114.** Neighbourhood plans are not automatically subject to SEA. Whether SEA is required for a neighbourhood plan will depend on what is proposed in the plan (eg the inclusion of site allocations) and the environmental sensitivity of the area.

**115.** With the majority of neighbourhood plans the likelihood of generating significant environmental effects will be the determining factor in whether an SEA is required. Case law has determined that the threshold for determining whether any effects will be significant is actually quite low. Even modest impacts on heritage assets could therefore be deemed significant and trigger the need for an SEA.

**116.** It is important to bear in mind too that 'effects' may be positive, negative or neutral. Impacts on assets could be interpreted as positive but an SEA might still be required.

**117.** From Historic England’s perspective, the most likely circumstances that could result in significant effects on the historic environment are when a neighbourhood plan body is considering allocating sites for development that would affect the significance of heritage assets. Whether the effects of the plan are significant or not will depend on the significance of the assets affected and the relationship of the site allocation to the asset(s). In most cases assessing this relationship is likely to be dependent on appropriate heritage expertise.

**118.** From a heritage perspective, an SEA is less likely to be needed if:

- the plan does not include site allocations or other policies that would establish a presumption in favour of development where none currently exists and/or
- the sites for development in a neighbourhood plan have already been specifically assessed through the SEA of a local plan and/or
- the plan does not include policies that will impact significantly on heritage assets.

**119.** Screening to determine whether an SEA is required relies on sufficient clarity in policy formulation or potential site allocations to allow for the likelihood of significant environmental effects to be determined. Screening at early stages in the plan formulation process may not provide sufficient evidence for an informed decision. Screening at a more advanced stage in the preparation of the plan when relevant details are known may therefore be necessary.

**120.** Introducing new site allocations during the plan-making process, particularly during its latter stages, may give rise to the need for an SEA, even if the screening process initially concluded that none was necessary. Proceeding with such a plan without undertaking an SEA is not recommended as it could lead to adverse impacts on the historic environment (even if unintended) and lead to the risk of the plan failing to meet the basic conditions required.

**121.** Even at the screening stage of an SEA a decision needs to be based on an appropriate level of evidence. This will vary from plan to plan depending on content and the heritage interest of the area. Assertion of a lack of impact on heritage assets or of an intention to conserve or enhance the historic environment is not in itself evidence nor justification for not undertaking an SEA – the SEA process tests whether these assertions are actually correct. It is important to liaise with the local planning authority about the need for an SEA, as outlined in the [PPG](#).

## 4.2 The benefits of SEA

**122.** The SEA process can help provide evidence to demonstrate conformity with the statutory provisions for the historic environment in the NPPF and local plan, and demonstrate that a robust, defensible process has been undertaken. For example, SEA provides an effective way to demonstrate how proposed sites were selected i.e. the reasonable alternatives that were considered and the justification for rejecting the sites that were rejected (such as, for example, negative impacts on a heritage asset from a particular type of development).

**123.** SEA also helps to identify where the impacts of developing a proposed site on a heritage asset merit the inclusion of criteria in the allocation policy to protect its heritage interest.

## 4.3 What is involved?

**124.** The first stage in SEA is screening ie the process of determining whether or not SEA is required for a plan. Guidance is available from Historic England on what to include when it is consulted (as one of the ‘consultation bodies’) on a screening opinion for SEA, as well guidance on the stages that follow screening (see [Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8](#) for more information).

**125.** Not all neighbourhood plans will be likely to have significant effects on the environment (natural, built or historic) and therefore not all will require a screening opinion. However, where a plan is subject to an SEA screening opinion, Historic England must be consulted.

**126.** This process is evidence-led, whereby the evidence gathered informs not only the options available but also the assessment of those options. This can be useful in drafting policies where one may explore whether it is possible to prevent harmful impact to heritage assets that might result, for example, from a site allocation, by the inclusion of particular design requirements for proposals on that site.

**127.** It is important to gather evidence that describes the baseline characteristics of the area ie the existing situation. Informed by reference to the HER, the baseline explores the existing issues affecting the plan area. Identifying existing or recent issues affecting heritage assets via the baseline is an important means of identifying issues for the area’s heritage that should be addressed through the plan policies.

**128.** Early in the assessment process, whilst gathering this data (referred to as the ‘scoping stage’) one should also identify any gaps in the evidence base that need to be filled to ensure the plan policies have a firm foundation. For example, where a conservation area exists the absence of a CA appraisal could be a significant gap in the evidence base as well as an

issue which the plan might wish to address. Alternatively, the absence of a local list or the absence of a survey of grade II listed buildings at risk may also be highlighted as gaps in the baseline at this stage.

**129.** Ultimately the SEA will help decision-makers to review impacts of the Plan and its policies on the historic environment. Could the expected impacts be mitigated by the proposed policy wording? Mitigation might include requirements for layout/design of the development to be informed by an archaeological investigation, or the specification of materials and form to be used for new buildings (such as through a Design Code) to ensure the preservation or enhancement of the character or appearance of a conservation area. The SEA will help to consider the future baseline and draw conclusions about whether the plan will have any cumulative impact on existing issues or help to resolve any issues specific to the area.

**130.** The [PPG](#) on this area of work is also a useful resource when undertaking SEA.

### Box 9: A simplified flow chart on SEA for neighbourhood planning

#### Screening

Is an SEA needed? If you do not allocate sites and do not include other policies that could impact significantly on heritage assets then, with regard to the historic environment, an SEA is less likely to be needed.



#### Scoping

During scoping, you determine the scope and level of detail required for the SEA and you develop a framework for assessing your policies. This requires you to describe the baseline characteristics of your area, making use of evidence gathered to inform your plan. When gathering data you should also identify any gaps in the evidence that need to be filled to ensure the policies have a firm foundation.



#### Assessing Options

During this stage you test the objectives of your plan against the SEA framework and evaluate how the policy options you are considering are likely to affect the characteristics identified in your baseline. Having assessed the options, choose your preferred option and where necessary consider any mitigation for harm that may result.

For more detailed guidance on SEA, refer to [Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8](#).

# 5

## The role of Historic England

**131.** As well as being the Government’s advisers on the historic environment Historic England can offer local advice too on a range of local historic environment issues in relation to historic places, heritage assets and plan-making. By virtue of the Localism Act 2011 Historic England has a statutory role in the neighbourhood development plan process and in most cases it is consulted at Regulation 14 (pre-submission) and Regulation 16 (publication) stages.

**132.** Notwithstanding this statutory role, consulting Historic England before the statutory stages is helpful, especially when neighbourhood planning groups envisage including site allocations.

**133.** Local planning authorities are encouraged to notify Historic England when neighbourhood areas have been designated and this helps to promote engagement at an early stage.

**134.** Consulting Historic England early in the plan-making process can enable Historic England to assist by:

- Providing best practice examples from other neighbourhood plans
- Highlighting opportunities to benefit the historic environment through the plan and maximise the benefits that can be obtained from the historic environment
- Advising whether ideas for a plan fully reflect the historic environment requirements set out in the National Planning Policy Framework
- Highlighting environmental assessment issues that may need to be undertaken with regard to impacts on the historic environment.

**135.** With neighbourhood plans being prepared by many communities across England, Historic England will target its resources on proposals with the potential for major change to nationally important heritage assets and their settings. However, Historic England's local offices may also advise communities where they wish to engage directly with the plan’s development subject to local priorities and capacity.



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# Historic England

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