

A Heritage Strategy for Stroud District

Valuing our historic environment and assets

Supplementary Planning Advice

Consultation Draft – January 2017



Cover illustration: Wallbridge circa 1785. © Stroud District (Cowle) Museum trustees, The Museum in the Park, Stroud.

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Why a heritage strategy?

- 0.1 The National Planning Policy Framework (NPPF) advocates that local planning authorities should produce a clear and positive strategy for the conservation and management of their area's heritage¹. Across the country, different local authorities have interpreted this in different ways. Some places identify a need to highlight a heritage which is somehow hidden, or bolster a heritage which is undervalued. For others, the impetus for producing a heritage strategy is closely bound up with trying to strengthen, reinvent or 'rebrand' their area, in conjunction with an ambitious cultural, economic or development vision for the future. Some areas have chosen to produce a strategy which looks at wider cultural heritage, encompassing built, natural and social assets, to reinforce a sense of community or paint a particular picture of their area.
- 0.2 And rightly so, because our built, natural and cultural heritage is fundamental to our local identity, and often to our quality of life.
- 0.3 In Stroud District, our heritage is certainly not invisible. Far from it: it is all around us. In fact, it is so much part of the scenery, so much a backdrop to our lives, that perhaps we don't perceive its value or recognise its impact as much as visitors do.
- 0.4 Stroud District has a genuinely exceptional collection of assets and a very high quality environment. So this Strategy is really about making sure that we value them, that we don't take this resource for granted, and that we all manage the District's assets in such a way that we hand on a positive legacy for the future.

A strategy for our District

- 0.5 Not only do we have a great heritage asset within Stroud District, but we are lucky to have an interested and informed community, including some highly active, knowledgeable and committed individuals and organisations. It is envisaged that the Heritage Strategy will be a strategy for the positive management and conservation of the District's heritage – rather than exclusively a Stroud District Council Strategy.
- 0.6 At the heart of this Strategy is a desire to maximise the contribution that the historic environment makes to the character of the District, its economic well-being, and the quality of life of its communities.
- 0.7 The District-wide Strategy and the Council's own supporting Action Plan will enable better and more efficient performance and more effectively targeted action, including through the identification of opportunities for partnership working, funding, training, education and capacity-building – for our communities as well as for those operating within Stroud District Council.

¹ NPPF para.157: "Crucially, Local Plans should ... contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified". And para.126: "Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats".

- 0.8 This project exists within a context of nation-wide reductions in public sector funding and cuts to local authority budgets. There is an inevitable impetus to “do more with less”, now and in the foreseeable future. Investigating opportunities to draw on diverse resources and to better employ the skills and enthusiasm of the District’s communities and interest groups in the positive management of our common heritage will be increasingly important. This approach to heritage management reflects an emerging national trend.
- 0.9 This approach also links with the “localism” agenda. This Strategy is timely, bearing in mind the increasing number of communities expressing interest in progressing Neighbourhood Development Plans (NDP). It is hoped that the emerging NDPs and the Strategy will inform each other, to their mutual benefit and to the benefit of our District’s historic environment. The Heritage Strategy will provide a strategic overview and a practical steer for emerging NDPs.

Stroud District Local Plan: *“Valuing our historic environment and assets”*



The adoption of the Stroud District Local Plan in November 2015 means that our District has a development plan which places the quality of our environment and surroundings at its heart.

- 0.10 *Conserving and enhancing Stroud District’s distinctive qualities*, including our rich built and natural heritage, is one of the Local Plan’s Strategic Objectives². During the Local Plan’s emergence, this guiding principle influenced strategic decisions about where future development will and will not happen and where large development allocations have been located, and it has helped to shape detailed place-making and design policies.
- 0.11 Local Plan **Policy ES10 “Valuing our Historic Environment and Assets”** is the principal policy against which decisions about development that affects the District’s historic environment will be assessed. The Local Plan set out the Council’s commitment to producing a heritage strategy to support Policy ES10³. This Strategy will provide evidence and explanation that will allow the Council to set informed priorities in relation to the conservation, management and monitoring of the District’s heritage assets.

² *Stroud District Local Plan*: Strategic Objective SO6: Our District’s distinctive qualities. Page 148.

³ *Stroud District Local Plan*: Policy ES10, supporting paragraph 6.55.

- 0.12 To support it, a Council **Heritage Action Plan** will be produced, consisting of a programme of works relating to the heritage priorities identified in this Strategy. The Action Plan will be periodically reviewed and refreshed. The intention will be to take an annual progress report to Environment Committee (or its equivalent).
- 0.13 The Local Plan sets out a series of key ‘indicators’ that relate to Policy ES10⁴. These are things which can be measured and monitored year by year, to give an indication of how successful the policy is and how effectively it influences planning policy decisions. At present, some of these things are not consistently practiced or monitored, so the Heritage Strategy and Action Plan need to set out:
- the nature and extent of a programme to monitor the District’s heritage assets “at risk”, including the degree of positive and proactive influence the Council may be capable of;
 - a programme for the appraisal and management of our conservation areas;
 - an appropriate methodology for the identification and assessment of non-designated heritage assets, including options for ‘local listing’ or alternative means of monitoring and managing such assets.

What are our big issues?

- 0.14 Most of the issues facing our historic environment and assets come down to a common core: it is essential that there is proper understanding of what we have and why it is significant. Without this, we will lose things. Without this, properly informed and balanced decision-making cannot take place. Without this, our distinctiveness gets watered down. And without this, opportunities to bid for funds or target investment may be missed.
- 0.15 Some of this rests with Stroud District Council, particularly in the execution of its role and responsibilities as local planning authority. But there is also a need for wider and better understanding amongst all individuals and organisations involved in managing, developing and conserving our historic environment and assets.
- 0.16 Through this Strategy, we will look at various opportunities to tackle the many ways that this is manifested, including:

Valuing our historic environment: an underappreciated asset?

Both within and outside the Council, there are highly informed, committed individuals and organisations who are passionate about our area’s history and environment and who work hard to champion and protect our heritage. But there is also a widespread deficit of understanding about what we have got here, perhaps even a bit of complacency.

A central goal for this strategy is to turn this around, to raise our exceptional heritage up the agenda and to encourage people to view the historic environment as a true asset, which not only has intrinsic cultural and aesthetic value, but which can also bring economic, social and environmental benefits to our area.

⁴ *Stroud District Local Plan: Appendix 1: Policy ES10 Key Indicators*

This is not necessarily about resources and money. But it does require effort, mindfulness and, above all, understanding. And a shift in the way we think about our heritage and historic environment – from thinking of it as something which is a bit of an obstacle, a constraint, a fringe benefit, to something which can drive positive change, bring opportunities and spark creativity and excellence.

Chapters 2 and 3 of this Strategy focus particularly on ‘understanding’ and ‘capitalising’, highlighting some of the issues and opportunities associated with this goal.

Our heritage “at risk”

A small proportion of Stroud District’s heritage assets have been formally identified as “at risk” through Historic England’s monitoring programme, Heritage at Risk (HAR). But there are gaps in our knowledge and understanding about the condition and vulnerability of Stroud’s wider historic environment. Chapter 4 of this Strategy takes a look at the many issues and opportunities associated with identifying and managing assets which are “at risk”.

Our local distinctiveness

Over the past few decades, economic pressures, ‘anywhere’ standard design in many new developments and, to some extent, changes to building regulations and energy efficiency requirements have begun to water down our area’s local distinctiveness. This is happening right across the District, including in conservation areas and where listed buildings are altered or extended. This is a self-perpetuating problem: the more frequently we see development which is non-contextual or non-distinctive, the more we see this as normal. It enters the local vocabulary. It sets a precedent, if only subconsciously, and it muddies the waters meaning that we are less able to pick out what really is locally distinctive or significant about a place.

The effects and underlying causes of this problem are recurrent throughout this Strategy, intertwined with a range of issues and opportunities, relating to many different types of heritage asset.

Objectives

The Heritage Strategy has three main objectives:

1. **To maximise the contribution that the historic environment makes to the character of the District, its economic well-being, and the quality of life of its communities;**
2. **To identify ways to positively address the issues and pressures that are facing our heritage assets;**
3. **To maximise opportunities for the historic environment to help deliver the District Council's wider corporate objectives, including those of the Local Plan.**

0.17 These objectives are all about properly *valuing* our historic environment and assets. To do this, we need to understand what we have got. We need to find ways to sensitively capitalise on it, in order to help sustain a long term future for our heritage assets and ensure that we hand on a healthy and positive legacy. We need to work on three things:

1. **Understanding** our heritage and its significance.
2. **Capitalising** on our heritage: identifying ways in which our historic environment really works as an 'asset' with cultural, economic, social and environmental value.
3. **Positive Management:** identifying issues and vulnerabilities, and highlighting opportunities to address them by making best use of expertise, resources and skills – both within and outside the Council.

A Vision

This Strategy envisages Stroud District as a place which understands and has pride in its heritage, where no one takes it for granted.

We will treasure the contribution that our historic environment makes to the character of the District, its economic and cultural wellbeing and the quality of life of our communities.

The historic environment will act as a stimulus and inspiration to development in all parts of the District so that it can reinforce local identity and play a part in increasing the appeal of the area as a place to live, work, visit and invest in – building a positive legacy for our future.

Strategy Priorities

0.18 From the objectives and the main issues facing our historic environment, flow five big priorities:

1. **Raising the historic environment up the agenda:** raising awareness about the value of our District's exceptional heritage, including its economic, wellbeing and environmental capital. This is partly about public awareness, but it is also about corporate awareness within Stroud District Council and about strengthening our commitment to positive management of the historic environment; and making the most of the role we can play in building a positive legacy for the future, across diverse service areas and corporate functions.
2. **Committing to the positive management of our District's heritage "at risk".** We need to fill in the gaps in our knowledge and understanding of what is at risk within Stroud District, and why. We must be able to make informed decisions about where and how to deploy resources effectively and proportionately and we need to develop strategies to manage a whole range of 'heritage assets', not just listed buildings.
3. **Establishing a programme for the appraisal and management of conservation areas.** The Council has a duty to review conservation areas from time to time and to publish proposals for their conservation and enhancement.
4. **Identifying and protecting non-designated heritage assets of local significance.** Many features of our historic environment are not formally 'designated'. We need to make sure they are properly (and proportionately) protected through the planning system and that assets of local significance do not fall through the net.
5. **Striving to conserve and enhance our local distinctiveness,** particularly through design and new development. Stroud District has a truly outstanding historic, built and natural environment and we have every reason to expect some of the country's best design solutions and consistently high standards of development. This is part of building a positive legacy for the future.

0.19 These are 'umbrella' priorities, which should help to steer future work in managing the District's historic environment and assets, including through the Council's own supporting **Action Plan** and future iterations of it. A diverse range of projects, functions and actions will fit within these overall priorities, and they will change over time. Suggested priorities for the first Action Plan are presented throughout this consultation draft.

Consultation Questions:

There is no structured 'questionnaire' associated with this consultation. We welcome comments about any aspect of this strategy and the Issues & Options discussion paper. But the following pointers will help us, and may help you to focus your feedback.

Strategy priorities: *Do you agree that these are reasonable priorities? Are some aspects more urgent or achievable than others? What kinds of actions, projects and opportunities should the first Action Plan focus on in order to start tackling these? Can you envisage any obstacles? If you object to any of these ideas, what are your reasons?*

1. Understanding: our heritage and its significance

What have we got?

	Total	Grade I	Grade II*	Grade II
Listed Buildings	3,291	43	203	3,045
Scheduled Ancient Monuments	68			
Registered Parks and Gardens	14	1	5	8
Registered Historic Battlefields	0			
Protected Historic Wreck Sites	0			
Conservation Areas	41			
Area of Outstanding Natural Beauty	1			
World Heritage Sites	0			

Table: Tally of Stroud District's designated Heritage Assets (December 2016)

- ★ 3,291 Listed Buildings. This is the number of entries in the statutory List, but it equates to more than 4,500 individual properties and structures.
- ★ Of the 37 local authority areas in the South West, only six have more listed buildings than us – including the vast county authorities of Wiltshire and Cornwall.
- ★ Given Stroud District's size and rural nature, we have an exceptionally 'dense' collection of listed buildings: on average, we have almost 7 listed buildings per sqkm – well over double the national average (2.9 per sqkm) and roughly twice the South West average (3.7 per sqkm).
- ★ We have 42 Conservation Areas. All our town centres are Conservation Areas, apart from Stonehouse. Stroud's Industrial Heritage Conservation Area is amongst Britain's largest.
- ★ A huge number of homes and businesses are affected by heritage designations: 4,368 addresses within Stroud District are affected by Listing (3,090 of which are residential properties); and 11,075 addresses lie within a Conservation Area (7,630 of them are residential).
- ★ Stroud District is home to almost 5% of the Registered Parks and Gardens in the South West region. Only six local authority areas in the South West have more Registered sites than us – including the large county authorities of Wiltshire and Cornwall.
- ★ We have 68 Scheduled Ancient Monuments (almost 1% of all the SAMs in the South West) and countless sites of archaeological interest that have not been formally scheduled.
- ★ The Cotswolds Area of Outstanding Natural Beauty (AONB) designation covers just over 50% of the District's entire land area.

Listed Buildings

- 1.1 When you consider the size and rural nature of our District, we have an exceptional ‘density’ of listed buildings packed into our 472 square kilometres.
- 1.2 As you would expect, our area’s long history of wool trade and cloth manufacture, upon which many of our towns and villages were founded [ILLUSTRATION], is reflected in the kinds of buildings and structures that are listed – as is the area’s later industrial diversification. More than 100 of Stroud District’s list entries are “mill” related – not only the numerous mill buildings which are such distinctive features of our local environment [ILLUSTRATION], but workshops, stores, offices and the prestigious mill owners’ or managers’ residences. Wealthy clothiers built some impressive mansions, many of which reveal the changing fortunes of their owners and the ups and downs of the cloth trade through the historic extensions or fashionable remodelling that was undertaken at different periods [ILLUSTRATION]. Buildings and structures relating to transport and industrial infrastructure also feature, including milestones, turnpike toll houses, canal bridges and locks, and Stroud’s railway station, which is home to the 19th century Grade II* listed goods shed, designed by Isambard Kingdom Brunel.
- 1.3 Perhaps a surprising by-product of the cloth industry, which brought enormous wealth to the district and particularly to clothier families, is the unusually high number of listed burial monuments, grave stones and – particularly – chest tombs in Stroud District. This dynastic wealth, combined with the abundant and good quality local limestone which lent itself to detailed, decorative carving, has left us with a peculiar legacy of more than 380 chest tombs dating from the 17th-19th centuries (more than 10% of all our listed buildings), a high proportion of which are listed Grade I or II*.

Scheduled Monuments and other archaeology

- 1.4 The South West is particularly rich in Scheduled archaeology, with an average 0.29 Scheduled assets per square km – almost double the average density for England as a whole (0.15 per square km). So Stroud (0.14 per square km) is fairly representative of the national average, although rather sparse compared to the South West average. Most English local authorities have fewer than 60 Scheduled Monuments within their boundaries.
- 1.5 33 of our 68 Scheduled Monuments consist partly or entirely of long- round- or bowl-barrows, which are ancient burial mounds. [ILLUSTRATION] Cotswold long barrows are internationally famous as one of the largest and most accessible groups of Middle Neolithic tombs in Britain. About sixty long barrows are known in Gloucestershire, including Hetty Pegler’s Tump (Uley) and Nympsfield Long Barrow on Frocester Hill, which have been excavated and are open to the public. The Toots on Selsley Common is well preserved, but unexcavated. Barrows are the most numerous type of heritage site on Historic England’s *Heritage at Risk* (HAR) register, and our own local situation seems to mirror the national picture: four of Stroud District’s five Scheduled Monuments in the 2016 HAR are barrows.
- 1.6 Stroud District’s Roman heritage is another notable source of archaeology [ILLUSTRATION]. The remains of 3 Roman villas have been scheduled – including the famous villa at Woodchester – and there are many other traces of Roman settlement, both designated and undesignated. At Kingscote, a large site in Cotswold District just crosses the border into our District: a Romano-British town consisting of more than 75 buildings – one of only 133 small Roman towns recorded in England. The Cotswolds was amongst the wealthiest and most

1. Understanding: our heritage and its significance

densely populated areas in the Roman province of *Britannia Prima* (which covered southwest England and Wales). The Severn Vale was also populated, but the picture of Roman and post-Roman habitation here is still evolving. Roman settlements have long been known about at Standish, Eastington and Frocester. But recent archaeological investigations (including finds at a development site on Foxes Field at Ebley and at Rectory Meadows in Kings Stanley) have unearthed traces of late Roman villas, suggesting that the Frome Valley was more densely inhabited during Roman times and contained more high status buildings than previously thought. [ILLUSTRATION]

Conservation Areas

- 1.7 We have 41 conservation areas in Stroud District, covering a really diverse range of places – from densely populated town centres, such as Stroud, Dursley and Berkeley, to the wide open spaces of Sharpness Old Dock and Stratford Park; from quintessential chocolate-box villages, like Bisley and Box [ILLUSTRATION], to impressive industrial heritage at places like Stanley Mills and Stroud Station.
- 1.8 In size, our conservation areas range from tiny, tightly-drawn Woodmancote (just 16,400 sqm) to the enormous Industrial Heritage Conservation Area (IHCA), which stretches more than 15 miles right the way across the middle of the District. Covering nearly 6.7 square km and tracing the watercourses of the industrial Stroud Valleys, from Framilode on the River Severn to Sapperton and Avening in the east, the IHCA is one of Britain’s largest conservation areas. It envelopes and links a series of smaller pre-existing conservation areas, which were also designated in recognition of the valleys’ exceptional industrial heritage. It is certainly an unusual conservation area, with its own particular issues and pressures, which this Strategy will examine in more detail. The IHCA and Stanley Mills CA are both currently assessed as “at risk” and appear in Historic England’s Heritage at Risk register. Our two conservation areas make up almost 6% of all the “at risk” conservation areas in the South West region⁵. [ILLUSTRATION]
- 1.9 All our town centres are conservation areas (with the exception of Stonehouse). Most of them have long histories as market towns, founded on the medieval wool trade and shaped by the changing fortunes of the cloth industry over the centuries. These are attractive town centres, whose draw and vitality today relies, to varying degrees, on the visible heritage which adds character and local distinctiveness to their roles as working, shopping and leisure environments.

Historic parks, gardens and designed landscapes

- 1.10 We have 14 Registered Parks and Gardens – Stroud District is home to almost 5% of the Registered Parks and Gardens in the entire South West region, and more than a quarter of Gloucestershire’s Registered sites. Only six local authority areas in the South West have more Registered sites than us – including the county authorities of Wiltshire and Cornwall.
- 1.11 Over half the District’s Registered Parks and Gardens are open to the public – either regularly or by arrangement. From the 12 acres of parkland around Misarden Park to England’s only

⁵ Historic England’s *Conservation Areas At Risk Survey (CAARS) 2016* and *Heritage at Risk Register (HAR) 2016*. 34 “at risk” conservation areas are identified in the South West region.

1. Understanding: our heritage and its significance

complete surviving 18th century Rococo garden at Painswick House, these assets are part of the Cotswold brand. Our area has particular associations with Arts & Crafts gardens and with famous designers such as Vita Sackville West, who had a hand in updating the 17th century walled gardens of Alderley Grange. [ILLUSTRATIONS]

Natural heritage and landscape

- 1.12 Over half our District is designated an Area of Outstanding National Beauty (AONB). Not only do we have an exceptionally high quality landscape, but part of the character and interest of the Cotswold AONB is derived from its historic buildings and settlements. From the rolling wold tops, populated by scattered farmsteads and hamlets; to the steep Stroud valleys, where weavers' settlements cling to the slopes and ancient trading routes are incised into the limestone; and the dramatic form of the Cotswold scarp, which plunges down to the Severn Vale. [ILLUSTRATIONS]
- 1.13 We must not forget though that beyond the AONB our District is rich in many other beautiful and fascinating landscape features. Nor should we forget the impact that the landscape and our place in the world has had in shaping our history: the River Severn has been a strategic trading and communications route since prehistoric times, while its estuarine landscape and the Vale lowlands were important to the rural economy. Traces of medieval and later agriculture are still visible in ridge-and-furrow undulations, as well as the field pattern and hedgerows in places. [ILLUSTRATIONS]

Museums and cultural heritage assets

- 1.14 Stroud's Museum in the Park is the District's flagship museum. Based at the Grade II listed former mansion house within Stratford Park (a conservation area), it is managed by the Council. The Council is also responsible for the management of other cultural and community facilities such as the Grade II Subscription Rooms in Stroud, which hosts events and exhibitions and is also home to the Tourist Information Centre. The District Council and some of our town and parish councils have an important role in the management of a broad range of buildings and assets which are either statutorily designated or have some local heritage interest.
- 1.15 There are many museums, visitor centres and heritage centres across the District, in private, public or charitable trust ownership, representing a diverse, exciting range of heritage and cultural interest. Amongst these, the Jenner Museum in Berkeley commemorates Edward Jenner, the 18th century pioneer of vaccination; the Stroudwater Textile Trust champions Stroud's industrial past; and the Woodchester Mansion Trust works to conserve and interpret the fascinating part-completed 19th century Victorian Gothic masterpiece, which was mysteriously abandoned in 1873.

Further information

- 1.16 More information and comparative data can be found in Historic England's national audit of the historic environment, Heritage Counts, carried out annually on behalf of the Historic Environment Forum. <https://historicengland.org.uk/research/heritage-counts/>

The story of our place

Consultation Questions:

There is no structured 'questionnaire' associated with this consultation. We welcome comments about any aspect of this strategy and the Issues & Options discussion paper.

This part of the Strategy will include a *very brief* summary of how the area known today as "Stroud District" developed over time, and the historic, visual and cultural legacy we are left with. We will look at early prehistoric settlement, the impact of successive waves of newcomers (Romans, Saxons, Vikings, Normans) and the significance of our area's location at a strategic pinch-point between the Cotswold hills and the River Severn. We will highlight the impact of Crown and Church on medieval life and how this shaped the kinds of buildings and settlements we are familiar with today. We will highlight the importance of the ancient wool trade and the role that our topography – with steep valleys and fast-flowing watercourses – played in our area's long and diverse industrial heritage. And how the area's industrial wealth (as well as periods of decline or hardship) gave us some of our most outstanding heritage assets.

Can you think of other ways that our heritage has been shaped by where we are in the world? Were there particularly important events or phases in the area's history which were key to the legacy we are left with? Are there things which might signal archaeological potential in particular parts of the District, or which might help us identify non-designated heritage assets that are of local significance?

2. Capitalising: valuing our historic environment and assets

- 2.1 The far reaching benefits of heritage are widely acknowledged and heritage impacts on many aspects of people’s lives. It is therefore important that heritage is not considered in isolation but in a wider context which takes account of its capacity for ‘added value’.

Economic benefits

- 2.2 The historic environment is intrinsically linked to economic activity. Many economic activities take place within the historic environment, are dependent upon it, or are attracted by it. Heritage is a major driver of economic growth – this is true nationally and it is true within Stroud District.

Wellbeing

- 2.3 The historic environment plays an important part in how people view the places they live, how they feel and their quality of life. Heritage can, of course, help to create a sense of place and local identity, and can foster a sense of community cohesion. But there are also interesting cause and effect relationships between heritage and health and wellbeing.

Building a positive legacy for the future

- 2.4 “Sustainable development” is at the very core of the planning system: achieving development that improves our social, economic and environmental conditions today, but not at the expense of future generations. Sustainable development is about change for the better, and not only in our built environment⁶. The historic environment, our built, natural and cultural heritage, has a key role to play in sustainable development - bringing about “change for the better”.

Raising awareness across the Council

- 2.5 Stroud District’s built, natural and cultural environment is intertwined with Council business on many different levels. But we can do much more to raise awareness about the value of our heritage in terms of its economic, wellbeing and environmental capital and to make the most of the opportunities offered by our historic environment to fulfil the Council’s corporate priorities and other objectives.

Priority 1:

Raising the historic environment up the agenda

⁶ Ministerial foreword to the NPPF

Economic benefits

- 2.6 This year (2016), Historic England and the Historic Environment Forum have placed particular emphasis on the relationship between heritage and the national economy in their annual 'audit' of the historic environment: *Heritage Counts*. Key findings for the South West include:
- Heritage generated £1.2 billion in Gross Value Added (GVA) in the South West in 2013 (comparable to agriculture, forestry and fishing at £1.3 billion). This is equivalent to 2.3% of total GVA in the South West (the figure is 2% nationally).
 - In total, domestic and international heritage-related visits generated £1.8 billion in expenditure in the South West.
 - There are an estimated 44,100 "heritage-related jobs" in the South West.
 - Repair and maintenance of historic buildings in the South West directly generated £974 million in heritage-related construction sector output in 2015. This is equivalent to 9.3% of total construction output or 24% of the repair and maintenance output in the South West (compared to 8% and 22% nationally).
- 2.7 Whilst we do not have the data to directly relate these findings to our local situation, there is no doubt that our historic environment and assets are responsible for a significant "Gross Added Value" to our District economy across a wide range of sectors and functions, including:
- Tourism and leisure
 - The construction industry and conservation specialists
 - Economic activity in historic buildings and places
 - Investigation, research and display of archaeological sites and structures
 - Education

Heritage-led regeneration, jobs and growth

- 2.8 Heritage can provide a key driving force in economic regeneration. The Government recognises that *"the development of our historic built environment can drive wider regeneration, job creation, business growth and prosperity"*⁷.
- 2.9 Nationally⁸, research indicates that:
- One in four businesses said that the historic environment is an important factor in deciding where to locate (this was rated equally important as road access)
 - Over 90% of respondents to a 2010 survey agreed or strongly agreed that investment in their local historic environment made the area a better place in which to live, work, visit or operate a business
 - Investment is worth the return: £1 of public sector investment in the historic environment generates £1.60 of additional economic activity over a ten year period

⁷ *Culture White Paper 2016* DCMS

⁸ *Heritage Counts: Heritage and the Economy 2016*. Historic England on behalf of the Historic Environment Forum. Reporting research by AMION and Locum Consulting, 2010.

2. Capitalising: valuing our historic environment and assets

- Approximately one in five visitors to areas which have seen historic environment investment spend more in the local area than before; and one in four businesses has seen the number of customers increase.
- 2.10 Stroud’s Local Plan recognises that, often, the land most in demand for new development in our District is also that which is at the very heart of our environmental heritage assets⁹. This is certainly an issue when it comes to protecting and enhancing our historic environment – but it is also an opportunity:
- 2.11 All our town centres are conservation areas (with the exception of Stonehouse, which nonetheless has some heritage interest). These are attractive town centres, whose draw and vitality today relies, to varying degrees, on the visible heritage which adds character and local distinctiveness to their roles as working, shopping and leisure environments.
- 2.12 The Council’s *Jobs and Growth Strategy* aspires to deliver investment in jobs and growth on key regeneration sites and new developments within the Stroud Valleys through the Stroud Valleys Initiative; while the Local Plan (Policy EI2) has identified some existing employment sites where targeted regeneration and mixed-use redevelopment could boost their current employment potential, economic output and community benefit. Many of these are historic mill sites and some lie within the Industrial Heritage Conservation Area and along the historic Cotswold Canals corridor, where they are well placed to benefit from the ongoing canal restoration and contribute to shaping what should become an exciting and valuable leisure, tourism and cultural asset, as well as delivering new homes and jobs.
- 2.13 The Council’s *Jobs and Growth Strategy* identifies the need to work with the Canal and River Trust to produce a ‘destination strategy’ for Sharpness docks and surrounding area – including the area around the Old Docks conservation area, which has been allocated for strategic development in the Local Plan. Sharpness is a really unusual, distinctive part of Stroud District, quite unlike anywhere else. Its unique heritage and atmospheric character could – and should – play a central role in shaping the future of Sharpness, acting as a positive driver for change and investment.

Creative and cultural industries

- 2.14 The Council’s *Jobs and Growth Strategy* identifies creative industries as one of the District’s key employment sectors, within which to focus job-creation investment. The District’s healthy creative economy is a particularly distinctive feature of the Stroud Valleys’ economic character¹⁰. The Stroud District Local Plan¹¹ envisages Stroud as “the beating heart of a flourishing artistic and cultural scene”, and links the regeneration of the industrial valley bottoms and the restoration of the Cotswold Canals with building a focus for creative and green industries. This is identified as a guiding principle, to be borne in mind when considering future development within the Stroud Valleys especially.
- 2.15 Nationally¹², research indicates that:

⁹ *Stroud District Local Plan 2015*. ‘Key Issue 79’, Chapter 1.

¹⁰ *Stroud District Settlement Role and Function Study 2014*, Chapter 3.

¹¹ *Stroud District Local Plan 2015*. ‘Vision 1.1’ and ‘Guiding Principles’ for the Stroud Valleys, pages 42-44.

¹² *Heritage Counts: Heritage and the Economy 2016*. Historic England on behalf of the Historic Environment Forum.

2. Capitalising: valuing our historic environment and assets

- Creative and cultural industries are 29 % more likely to be found in a listed building than in a non-listed building in England (HLF 2013)
- A very high proportion of creative industries based in historic buildings are start-ups, with over 60 per cent established between 2010 and 2013 (HLF 2013)
- Property agents state that historic buildings are attractive to creative industries because they are smaller, more flexible and cost-effective (AMION and Locum Consulting 2010).

2.16 As well as offering creative industries an attractive permanent base, our District's natural and built environment is a huge draw to temporary or visiting creative enterprises. In recognition of the significant economic benefits that film and TV production can bring to the local economy, Stroud District Council has signed up to Creative England's Film Charter, committing all council departments to a "film friendly attitude". Creative England estimated productions spent over £4 million in Gloucestershire in 2014, and that film production can bring up to £32,000 per day into the local economy when filming on location, using local hotels, facilities and traders.

Tourism, visitors and leisure

- 2.17 An estimated £144 million was spent by day tripping and overnight visitors to Stroud District in 2014, with a tourism-related business turnover of more than £184 million. Around 3,199 people are believed to be employed in jobs relating to Stroud's tourism sector, which is 5% of the District's employment offer¹³.
- 2.18 Market research in 2012¹⁴ (which quizzed people who were familiar with our area and those who were not) suggested that people most associate the Stroud 'brand' with market towns, villages, scenic countryside; historic attractions, sites and landscapes; and food and drink. The study, which examined perceptions and experiences of visiting The Cotswolds, revealed that many of the things that people most sought or expected from The Cotswolds are things which Stroud can offer in abundance: villages (appealed to 77% of respondents), Areas of Outstanding Natural Beauty (79%), places with interesting architecture (69%), market towns (75%), local view points (72%), rivers, canals and waterways (67%).
- 2.19 Local Plan site allocation **SA5** includes the historic Old Dock conservation area at Sharpness. With its emphasis on delivering a mix of tourism, leisure and recreational uses, supported by housing development, the allocation reflects the Local Plan's vision for the cluster of parishes around Berkeley: boosting the area's established tourism and visitor economy, whilst conserving and managing the rich built and natural heritage.

[ILLUSTRATION: Creative and cultural industries are 29 % more likely to be found in a listed building than in a non-listed building in England (HLF 2013)]

[ILLUSTRATION: Our District's natural and built environment is a huge draw to temporary or visiting creative enterprises, including film and TV productions, which can bring significant expenditure and investment into the local economy]

¹³ *The Economic Impact of Gloucestershire's Visitor Economy 2014*. The South West Research Company Ltd on behalf of Stroud District Council, 2016.

¹⁴ Arkenford [reference!]

Wellbeing

2.20 Our built and natural heritage offers diverse opportunities to bring benefits to community and individual health and wellbeing, including -

- Providing community or cultural facilities through the adaptive re-use of historic buildings
- Nurturing self-identity and mental health through interaction with historic places or objects
- Helping communities to identify what is of local heritage value and what may be significant to their community identity and distinctiveness
- Reinforcing community or family cohesion through shared experiences – whether through reminiscences, education and learning or simply to a fun day out
- Volunteering: bringing benefits to both the individual and the wider community, as well as to the heritage asset itself
- Improving physical health and activity levels through access to natural heritage sites, including our historic parks and gardens, the many historic sites and viewpoints dotted across our landscape, the Cotswold AONB and our hill-top commons

Physical and mental health

2.21 Whilst ‘old’ buildings are generally valued by people of all ages and are commonly considered to be more “beautiful” than new buildings¹⁵, it seems that built heritage has particular value to older people – perhaps due to a sense of continuity, longevity and familiarity. There is evidence to suggest that engagement with museum and gallery collections can enhance people’s physical and mental wellbeing and even improve their life expectancy¹⁶.

2.22 Encouraging older people to reminisce has been shown to enhance both the inner self and social skills. Furthermore, shared memories amongst the elderly opens up a potentially lonely time of life in to one that favours passing on knowledge and bolstering a sense of place¹⁷.

2.23 Our historic environment also offers opportunities for people of all ages to get involved physically and practically. From volunteers working physically hard to repair features along the Cotswold Canals, to the rural skills workshops and schools’ outdoor learning sessions run at the National Trust’s Ebworth Centre, Stroud’s urban and rural environment is rich with opportunities for active engagement.

Encouraging participation

2.24 The extent to which people ‘give’ to heritage – both financially and through giving time – can be seen as an indicator of how much they value heritage. A 2016 research review by the Heritage Lottery fund (HLF) into the *Values and Benefits of Heritage* reported that 7% of respondents to a national 2015 survey by DCMS had volunteered in the heritage, museum or library sectors within the previous 12 months. This equates to approximately 3.7 million people (DCMS Taking Part Survey 2014/15).

¹⁵ *Values and Benefits of Heritage*, 2016. Research review by HLF. 1.1.2, p5.

¹⁶ *Values and Benefits of Heritage*, 2016. Research review by HLF. 3.1, p 14-15.

¹⁷ This premise was at the heart of a heritage, health and wellbeing project, developed by the Manchester Museum in conjunction with Manchester City Council’s Valuing Older People initiative

2. Capitalising: valuing our historic environment and assets

- 2.25 Nationally, older people are more likely to attend museums and heritage sites than younger people. However, a person who visited a heritage site or museum as a child is more likely to visit throughout adulthood¹⁸. Encouraging access by youngsters is a way of fostering a lifelong interest and sense of value.

[ILLUSTRATION: “RemPods” – a local Stroud-based company. Dementia and memory: handling objects and nostalgic settings...]

[ILLUSTRATION The new ‘learning pavilion’ at Stroud’s Museum in the Park (part funded by Gloucestershire Environment Trust’s largest ever grant)¹⁹ offers new facilities for school children and organisations such as Dementia Adventure.]

Building a positive legacy for the future

- 2.26 “Sustainable development” is at the core of the planning system. The foreword to the NPPF explains that -
- “The purpose of planning is to help achieve sustainable development. Sustainable means ensuring that better lives for ourselves don’t mean worse lives for future generations. Development means growth... Sustainable development is about change for the better, and not only in our built environment.”²⁰*
- 2.27 Sustainability is often described as having three elements: social sustainability, economic sustainability and environmental sustainability. All three are interlinked and consideration of development proposals tends to require a balanced judgement about the relative gains (or losses) that the proposal might bring about in relation to each three.
- 2.28 The historic environment, our built, natural and cultural heritage, has a key role to play in sustainable development - bringing about “change for the better”. This is up-front in the NPPF, which states that pursuing sustainable development involves seeking positive improvements in the quality of the historic environment (NPPF, paragraph 9); and that Planning should always seek to secure high quality design and should conserve heritage assets in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations (NPPF, paragraph 17).
- 2.29 And our own Local Plan recognises that, whilst the preservation and protection of the historic environment is one half of the story, new development also offers opportunities for positive change:
- New development should maintain and, where appropriate, *enhance* heritage assets and their settings in a manner that is appropriate to their significance²¹;
 - The historic environment should act as a stimulus and inspiration to place making in all parts of the District so that it can *reinforce local identity* and play a part in *increasing the appeal of the area* as a place to live, work, visit and invest in²²;

¹⁸ *Values and Benefits of Heritage*, 2016. Research review by HLF. 2.3, p 13

¹⁹ Stroud District Council *Corporate Delivery Plan 2015-2019*, p 7

²⁰ Ministerial foreword to the NPPF

²¹ *Stroud District Local Plan*, Policy ES10 and paragraph 6.56

²² *Stroud District Local Plan*, paragraph 6.53

2. Capitalising: valuing our historic environment and assets

- New development should seek opportunities to draw on the historic environment in order to maintain and *enhance* local character and distinctiveness²³.
- 2.30 The adaptation of historic buildings offers opportunities to provide secure and positive futures for the District’s heritage assets, whilst also improving their usefulness as places to live and work.
- 2.31 New development is one of the most conspicuous ways in which the character and quality of a place can be either reinforced or degraded. The Local Plan encourages *all kinds of new development in all parts of the District* to use our historic environment as a stimulus to high quality, imaginative design. Chapter 4 looks in more detail at opportunities associated with new design and development, within and inspired by the historic environment.

[ILLUSTRATION: Cashes Green Hospital – a local heritage asset adapted for housing with new development around, creating a distinctive community with a very strong sense of place.]

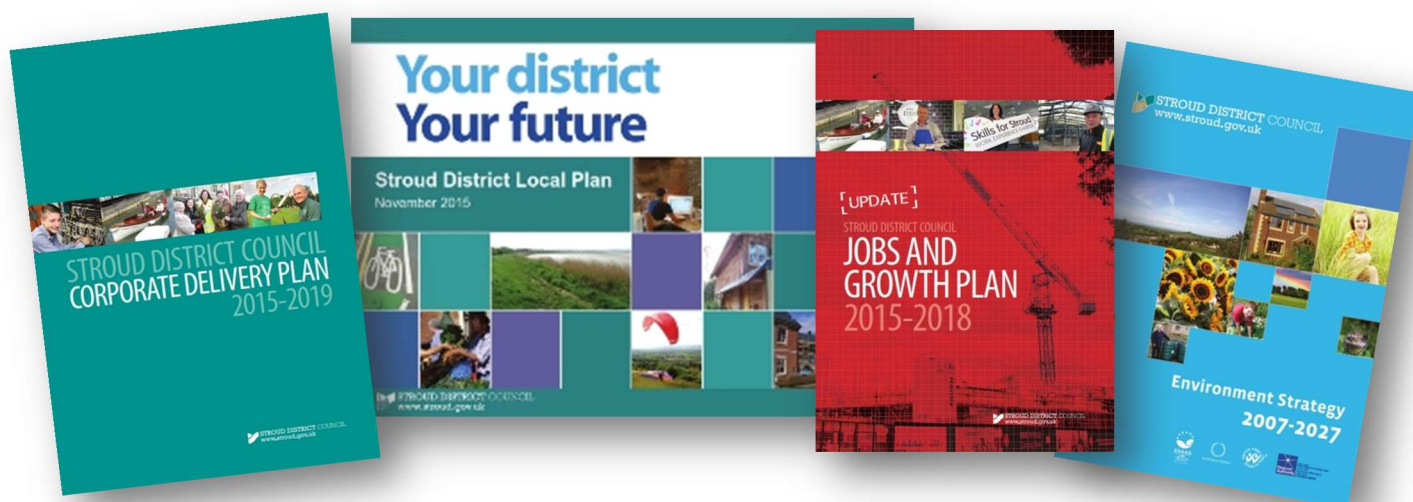
²³ *Stroud District Local Plan*, paragraph 6.56

Raising awareness across the Council

- 2.32 Stroud District’s built, natural and cultural environment is intertwined with Council business on many different levels. But we can do much more to raise awareness about the value of our heritage and to exploit its potential economic, wellbeing and environmental capital.
- 2.33 The District Council’s **Vision**, which guides the Corporate Delivery Plan and the allocation of Council resources, is of *“leading a community that is making Stroud District a better place to live, work and visit for everyone”*. Most people’s experience of living in, working in or visiting our District is touched in some way by our built and natural heritage. It is a heritage that is evident right across our area and it is an important part of Stroud District’s ‘brand’.

What do our corporate strategies say?

- 2.34 The Council’s **Corporate Delivery Plan 2015-2019** and the **Jobs and Growth Plan [update] 2015-2018** cite the economic benefits and the Council’s investment in key regeneration projects, including the Cotswold Canals project, the Stroud Valleys Initiative, the planned redevelopment of Sharpness Docks and Brimscombe Port and the forthcoming town centres’ role and function study, as well as the District’s growing links with the film industry through Creative England.
- 2.35 All of these projects feed directly or indirectly off our area’s historic environment (and have significant impacts upon it), deriving at least some value and impetus from their heritage assets. Several of these projects have received some form of heritage-related funding. It is clear that a diverse range of initiatives have been undertaken over the years, by many different parts of the Council organisation, which have in some way recognised, celebrated or capitalised upon our distinctive heritage.
- 2.36 Future review of these and other corporate strategies offer valuable opportunities to make more explicit links to the economic value and the potential offered by our area’s historic and natural heritage. There is also an opportunity to broaden the traditional **Environment Strategy** focus on tackling climate change, reducing the District’s carbon footprint and reducing waste to also reflect the importance of “sustainable development” in handing on a positive legacy to future generations and helping us to live within our environmental limits – better reflecting the interpretation in both the NPPF and our own **Local Plan**.



- 2.37 Our built and natural heritage can help to deliver corporate objectives and the Council's six key priorities:

Economy: *Help local people and businesses grow the local economy and increase employment.* This chapter has already identified several ways in which our historic environment is an asset to our economy – including through tourism and leisure, creative industries, business start-ups, regeneration, town centre vitality and specialist trades and crafts.

Affordable housing: *Provide affordable, decent and social housing.*

The adaptation of historic buildings offers opportunities to provide new homes, including social housing. And, conversely, the construction of new housing is one of the most conspicuous ways in which the character and quality of a place can be either reinforced or degraded. The Local Plan encourages all kinds of new development in all parts of the District to use our historic environment as a stimulus to high quality, imaginative design. This should be true of the Council's own projects, as well as those delivered through the open market.

Environment: *Help the community minimise its carbon footprint, adapt to climate change and recycle more.* Converting and re-using an old building is the ultimate form of recycling, involving less waste and embodied energy than demolishing it and building a new one. A broader "environment" focus, which references the Council's role in protecting and shaping the quality of our natural and built surroundings, could subtly but effectively raise the agenda: in terms of recognising, celebrating and conserving our heritage, and in terms of the importance of building a positive legacy for the future through new development and regeneration.

Resources: *Provide value for money to our taxpayers and high quality services to our customers.* This Strategy provides evidence and explanation which will allow the Council to set informed priorities relating to the discharge of its duties to conserve and manage the historic environment, including Council-owned assets. This will enable better and more efficient performance and more effectively targeted action, including through the identification of opportunities for partnership working, funding, training, education and capacity-building. The current Corporate Delivery Plan identifies as a key focus the need to invest in projects and Council assets that deliver a return, generate income or deliver savings, so enabling the Council to fund essential public services. Our historic environment offers opportunities for this.

Health and wellbeing: *Promote the health and wellbeing of our communities and work with others to deliver the public health agenda.* This chapter has explored several positive and perhaps unexpected ways in which our built and natural heritage can boost health and wellbeing – including through physical and outdoor activity; memory and reminiscence; community identity, cohesion and sense of place; shared experiences and interactions which combat isolation; leisure; and the generally uplifting effect of being in attractive, well cared-for surroundings.

- 2.38 Encouraging everyone in our organisation to be mindful of the quality of our heritage – and knitting this into the Council's corporate literature, plans and strategies in a more overt and joined-up way – is an effective, minimal-cost means of valuing our historic environment and assets: raising awareness of what we have here, reinforcing our District's 'brand', giving proper credit to the work that the Council and partner organisations already do and the benefits that are brought to our District.

2. Capitalising: valuing our historic environment and assets

- 2.39 Corporate mindfulness may also work as a virtuous circle, paving the way for even smarter, more inventive ways of capitalising. Our heritage could – and should – be a positive driving force for Stroud District. There are a myriad ways that this asset can help us to achieve corporate objectives, deliver services and bring about community and economic benefits – but it requires a strategic approach.

A Heritage Champion

- 2.40 70% of all Local Authorities have a “Heritage Champion”²⁴ – normally a councillor who has been nominated by their authority to be an advocate for all aspects of the historic environment in their area and to promote the role that heritage can play in achieving the authority’s wider objectives.
- 2.41 The idea of a Heritage Champion (sometimes a “Design and Historic Environment Champion”) has been around for more than ten years, promoted by the Government and by Historic England (as well as the former Commission for Architecture and the Built Environment, CABE). Nationally, whether or not a local authority has a Heritage Champion is monitored by Historic England on behalf of the Historic Environment Forum and is reported in the annual *Heritage Counts* publication.
- 2.42 Locally, Cotswold District, Gloucester City, Tewkesbury Borough, South Gloucestershire and Bristol all have Heritage Champions.
- 2.43 It is up to each local authority to decide what nomination process to use and to shape the precise scope and remit of the role. But a Heritage Champion will generally:
- Generate enthusiasm for and awareness of the importance of the local historic environment
 - Help ensure that commitment to the proper care of the historic environment is embedded in all relevant activities and plans of the local authority
 - Influence and communicate with others to ensure benefits for the historic environment.
- 2.44 Historic England’s publication *The Heritage Champion’s Handbook* provides useful pointers, suggesting exciting opportunities for such a role and the benefits it could bring to Stroud District.

²⁴ Historic England *Heritage Champions Handbook*, 2016 <https://historicengland.org.uk/images-books/publications/heritage-champions-handbook/>

Next steps

Strategy Priority 1: Raising the historic environment up the agenda.

We need to work to raise awareness about the value and potential of our heritage in terms of its economic, wellbeing and environmental capital.

*A range of other options, opportunities and more detailed potential next steps are set out in the supporting **Issues & Options Discussion Paper**, which forms part of this consultation. But we think these should be the main priorities for the Heritage Action Plan:*

Action Plan Priority? Seeing our heritage as a positive driving force

Stroud District Council should endeavour to embed “heritage” (the District’s historic built and natural environment and historic cultural resources) into our corporate thinking and into the writing and review of corporate publications, with a view to:

- generating enthusiasm for and awareness of the importance of our exceptional local historic environment
- showing explicit commitment to the proper care of the historic environment and embedding this in all relevant Council activities and Council plans
- paving the way for cost-effective and inventive ways of capitalising on this asset, to help the Council achieve corporate objectives, deliver services and bring about community and economic benefits.

Action Plan Priority? Someone to ‘champion’ our heritage and the quality of our built and natural historic environment

The Council should consider the nomination of a councillor to act as a Historic Environment Champion for the District. They will play a key role in promoting the aims and priorities of the Heritage Strategy.

Consultation Questions:

There is no structured ‘questionnaire’ associated with this consultation. We welcome comments about any aspect of this strategy and the Issues & Options discussion paper. But the following pointers will help us, and may help you to focus your feedback.

*Can you think of other ways that our heritage is – or could be – an **economic asset**? How else might our historic environment contribute to our local economic vitality?*

*Can you think of other ways that our heritage might contribute to our **social or cultural wellbeing**?*

*Can you think of other ways that our heritage links to the idea of **building a positive legacy for the future** and making positive environmental gains?*

Can you think of any specific examples or illustrations?

***Next steps and priorities for future action:** what do you think of the suggestions (and other opportunities identified in the Issues & Options discussion paper)? Do you agree that these are reasonable priorities? Are some aspects more urgent or achievable than others? Can you envisage any obstacles? If you object to any of these ideas, what are your reasons?*

3. Positive management: identifying issues and opportunities

- 3.1 Heritage is not self-managing. Without intervention, over time, things start to degrade: whether through natural weathering processes, through damage, demolition, physical alterations and additions to the historic fabric, or through changes to the surroundings and context. We want to identify opportunities to enhance the positive management of the historic environment – including the potential to make use of expertise and resources outside the Council, to improve communication and education, and to build capacity within the District’s communities.
- 3.2 This part of the Strategy investigates key vulnerabilities, issues and pressures that face Stroud’s diverse heritage assets, how they are currently addressed, and whether there are opportunities for change.
- 3.3 The supporting **Issues & Options Discussion Paper**, which accompanies this consultation draft, looks at a broad range of issues (including those that were identified through the Local Plan-making process) and at potential opportunities for tackling them. But four of the Strategy’s main priorities umbrella over many of them:

Priority 2. Committing to the positive management of our District’s heritage “at risk”

Priority 3. Establishing a programme for the appraisal and management of conservation areas

Priority 4. Identifying and protecting non-designated heritage assets of local significance

Priority 5. Conserving and enhancing our local distinctiveness, particularly through design and new development

Our heritage “at risk”

Filling in gaps in our knowledge and understanding

- 3.4 A small proportion of Stroud District’s heritage assets have been formally identified as “at risk” through Historic England’s monitoring programme, Heritage at Risk (HAR). In 2016, 17 of our designated heritage assets have been included on the HAR Register:
- ★ 5 Scheduled Monuments. Four of which are long- or bowl-barrow burial mounds, and one of which is a former Saxon church at the site of Leonard Stanley priory.
 - ★ 10 Listed Buildings. Three of which are Grade I; five are Grade II*; two are Grade II. The ten includes six listed places of worship (churches), two mill buildings (at Stanley Mill and Longfords Mill), St Mary’s Mill House, and Woodchester Mansion.
 - ★ 2 Conservation Areas: Stanley Mills CA and the Industrial Heritage CA (IHCA). These appear as new entries on the 2016 HAR Register, identified through Historic England’s Conservation Areas At Risk Survey (CAARS). Our two conservation areas make up almost 6% of all the “at risk” conservation areas in the South West region²⁵.
- 3.5 Aside from the two conservation areas, most of these have been on the HAR Register for many years. The Grade II* Brownhill Court (Painswick) is one of just 8 listed buildings which have been removed from the South West HAR Register since last year²⁶: its future is now secured and it has undergone a programme of repair which means it is no longer at risk.
- 3.6 Historic England does not monitor Grade II listed buildings through the HAR programme, except for listed places of worship (hence only two of our Grade II buildings appear on the Register). So the HAR completes only part of the picture.
- 3.7 A co-ordinated, up-to-date and regularly monitored Buildings At Risk programme should be a key tool in local authorities’ management of their most vulnerable heritage assets – particularly for Grade II listed buildings, which generally see much less involvement and intervention from Historic England and other national bodies.
- 3.8 Currently, Stroud District Council does not have a co-ordinated Buildings at Risk (BAR) programme and, whilst pro-active intervention does happen, this is *ad-hoc* and successes are not widely known about because our Register is not publicly accessible. This is a key opportunity for the Council in terms of:
- ✓ Providing evidence that will allow the Council to set informed priorities in relation to the resourcing and management of the District’s heritage assets
 - ✓ Helping to identify patterns, trends and common issues, which may suggest unforeseen solutions
 - ✓ Building a case for applications for financial aid / other assistance from Historic England, the Heritage Lottery Fund or other sources

²⁵ Historic England’s *Heritage At Risk Register 2016* identifies 34 “at risk” conservation areas in the South West region.

²⁶ Historic England’s *Heritage At Risk Register 2016*, page xiv

3. Positive management: our heritage “at risk”

- ✓ Monitoring the effectiveness of Local Plan Policy EH10 (SDLP key indicator)²⁷
- ✓ Making the register and key findings publicly accessible may encourage greater community involvement and may encourage new owners / occupiers / users to come forward with investment and alternative uses
- ✓ Celebrating success stories

- 3.9 Historic England is currently (2016) piloting a protocol, online tool and electronic App which will support volunteers in recording the condition of their local Grade II listed buildings. When it launches nationally, the Grade II Condition Survey project²⁸ will offer a great opportunity for communities, individuals and specialist interest groups to get involved in monitoring their area and helping to identify buildings and structures most in need of intervention. Historic England will share the information gathered with the District Council, to inform our Buildings at Risk work.
- 3.10 2016 was the first time Stroud District Council participated in the nation-wide CAARS survey, which has been running since 2009 and is designed to be an annual audit of all England’s conservation areas. 90% of local authorities have carried out the survey at some point since 2009, allowing Historic England to build a strong national picture, to identify trends and issues, to focus resources and develop its national and regional strategies. The CAARS has provided us with some very useful comparative information and has flagged up particular vulnerabilities in some of our conservation areas.

Particular vulnerabilities

- 3.11 The fact that the Industrial Heritage Conservation Area (IHCA) and Stanley Mills Conservation Area have both been identified as “at risk” through the CAARS process is significant: the vulnerability of Stroud District’s industrial heritage reflects a common picture across the whole country. A survey undertaken in 2011 to support a Historic England initiative to tackle the problem found that, nationwide, the percentage of listed industrial buildings at risk was three times greater than the national average for listed buildings at risk. In our area, the vulnerabilities relate partly to issues around adaptation and re-use of redundant buildings and sites. National research²⁹ suggests that former textile industry buildings and country houses typically face the most acute ‘conservation deficit’ (i.e. the difference in the cost of repair compared to the end value) of all the various types of heritage assets on the current HAR. But our historic industrial environment is also complex and not always ‘attractive’. Its historic and architectural interest can be easily eroded by poorly contextualised new development and incremental, seemingly minor, losses because the significance is not always easy to appreciate.
- 3.12 Almost a quarter of our assets on the HAR Register are barrows. Nationwide, barrows (prehistoric burial mounds) are the most common type of heritage asset on the Register, making up 15.6% of all the HAR entries in 2015. The South West is home to more than half of these, reflecting a particularly distinctive feature of the region’s heritage. Nationally, the biggest risk posed to barrows is from ploughing (or “clipping”), whilst animal burrowing and scrub growth are also significant risk factors.

²⁷ Stroud District Local Plan, APPENDIX 1: Monitoring framework

²⁸ <https://conditionsurvey.historicengland.org.uk/home>

²⁹ Historic England’s *Heritage At Risk Register* 2016

Management tools, resources and powers to intervene

- 3.13 Both the annual CAARS survey and the Grade II Condition Survey provide useful tools for monitoring and benchmarking the condition of the District’s heritage assets and identifying risk factors. The findings should be used to inform the Council’s Buildings at Risk work and to help prioritise action and intervention, where necessary.
- 3.14 Historic England has nine local teams, each of which has a specific focus on reducing local heritage at risk. Stroud District falls within the South West team’s area. They use the outcomes of research and the annual HAR Register to help prioritise where they focus their time and funding. They work with partners such as the Heritage Lottery Fund and Natural England to support owners with funding to help them understand what repair or conservation works are needed, as well as the actual work.
- 3.15 Stroud District Council has a range of powers to intervene where heritage assets are subject to damage, neglect or deterioration. The powers vary by asset-type, and depend upon the severity of the building or structure’s condition. Urgent Works Notices³⁰, Repairs Notices³¹ and Tidy-up Notices³², along with powers of compulsory purchase (CPO)³³ are perhaps those most commonly associated with dealing with buildings at risk – particularly listed buildings. But there are other powers and procedures which can be employed – for example, powers designed to deal with empty homes³⁴ or dangerous structures.
- 3.16 These various powers are summarised in the supporting **Issues & Options Discussion Paper**, which accompanies this consultation draft Strategy. Historic England’s publication *Stopping the Rot*³⁵ explains these powers more fully and is full of useful advice on how to make creative and effective use of a wide range of resources.
- 3.17 A growing number of local authorities are signatories to a [memorandum of understanding](#) with the police, CPS and Historic England, which sets out the various authority roles in tackling heritage crime. An action plan for all those signed up to the MOU is drawn up each year, based on the results of a strategic assessment, thereby ensuring a co-ordinated approach to dealing with the problem of crime and anti-social behaviour within the historic environment.
- 3.18 It will be helpful to undertake a regular review of external funding sources and to ensure that potential avenues for attracting investment and resources into the District are well publicised among stakeholders.

³⁰ Section 54 of the Planning (Listed Buildings and Conservation Areas) Act 1990

³¹ Section 48 of the Planning (Listed Buildings and Conservation Areas) Act 1990

³² Section 215 of the Town and Country Planning Act 1990

³³ Section 47 of the Planning (Listed Buildings and Conservation Areas) Act 1990

³⁴ Section 132 of the Housing Act 2004; Section 17 of the Housing Act 1985; Law of Property Act 1925

³⁵ Historic England *Stopping the Rot: a guide to enforcement action to save historic buildings*, April 2016

Next steps

Strategy Priority 2: Committing to the positive management of our District’s heritage “at risk”.

- 3.19 Stroud District Council should put in place a co-ordinated, up-to-date and regularly monitored Buildings at Risk programme, to enable targeted and proportionate intervention aimed at reducing the severity and number of assets “at risk”.
- 3.20 *A range of other options, opportunities and more detailed potential next steps are set out in the supporting **Issues & Options Discussion Paper**, which forms part of this consultation. But we think these should be the main priorities for the Heritage Action Plan:*

Action Plan Priority? Buildings at Risk (BAR)

The Heritage Action Plan should set out a programme for the identification and ongoing monitoring and management of historic “buildings at risk”, with the ultimate aim of having an up-to-date Register made publicly available.

The programme should aim to include a diverse range of heritage assets within the Register: in addition to listed buildings of all Grades, the BAR programme should apply to conservation areas, non-designated heritage assets (including those that are ‘locally listed’), unlisted buildings in conservation areas, scheduled monuments and other known but non-designated archaeology.

The programme should set out a reasonable target for what can be achieved within the next five years and should be reviewed each time the Action Plan is refreshed.

Action Plan Priority? Conservation Areas At Risk Survey (CAARS)

The Council should commit to the annual appraisal of our conservation areas’ condition and vulnerability through Historic England’s Conservation Areas At Risk Survey (CAARS). The findings should be used to inform the Council’s Buildings at Risk work

Action Plan Priority? Grade II Condition Survey

Stroud District Council should actively encourage and support community volunteers to take part in the Historic England Grade II Listed Building Condition Survey. The findings can inform the Council’s Buildings at Risk work and the annual CAARS survey.

Consultation Questions:

There is no structured ‘questionnaire’ associated with this consultation. We welcome comments about any aspect of this strategy and the Issues & Options discussion paper. But the following pointers will help us, and may help you to focus your feedback.

Stakeholders: *Are there opportunities for any key stakeholders to become more involved in the management of our District’s assets ‘at risk’? What roles do they, or could they, play? What benefits might be gained from other private, public or voluntary/charity sector involvement in the management of Stroud’s heritage at risk?*

Mechanisms, tools, initiatives, funding and resources: *Can you think of any other*

3. Positive management: our heritage “at risk”

national or local tools and resources which could help with positively managing the District’s heritage assets ‘at risk’? Can you think of successful examples within the District or elsewhere? Are there any pitfalls or obstacles?

Issues and pressures: *Are you aware of any particular issues or pressures which are significant risk factors for the various types of heritage assets in Stroud District? We would most like to identify issues that are common or widespread, rather than issues that are unique to an individual building (although relevant information about specific listed buildings could potentially be stored and referred to in any future Buildings at Risk review programme). Can you suggest any additional ways of addressing issues, pressures or vulnerabilities that affect heritage assets in Stroud District?*

Next steps and priorities for future action: *What do you think of the suggestions? Do you agree that these are reasonable priorities? Are some aspects more urgent or achievable than others? Can you envisage any obstacles? If you object to any of these ideas, what are your reasons?*

Our local distinctiveness: design and development

How can we ensure we hand on a positive legacy?

- 4.31 This Strategy has already looked at how valuable our historic environment is to our local distinctiveness, and how important it is that we protect and enhance our built and natural heritage so that we are able to hand on a positive legacy to future generations. Chapter 3 highlighted how it is possible to capitalise on the heritage assets that we have, in order to bring about positive changes: changes which benefit both the assets themselves and the wider social, economic and visual environment.
- 4.32 But over the past two or three decades, economic pressures, global markets and ‘anywhere’ standard design in many new developments have begun to water down our area’s local distinctiveness. This is happening right across the District, including in conservation areas and, to a lesser extent, where listed buildings are altered or extended.
- 4.33 This is self-perpetuating: the more frequently we see development that is non-contextual or non-distinctive, the more we see this as normal. It enters the local vocabulary. It sets a precedent, if only subconsciously, and it muddies the waters meaning that we are less able to pick out what really is locally distinctive about a place.
- 4.34 This does not mean that all development has to directly mimic traditional buildings in every respect, although that is an entirely valid design approach. So-called “pastiche” design seems to be derided and loved in equal measure, depending on whether you are designing it, living in it or looking at it through your window. Sometimes, it is the best way of conserving the architectural or historic significance of a place, or enhancing its character. As a broad generalisation, this does seem to be the approach favoured by many community-led design statements.
- 4.35 But it is also possible to design and build in a locally distinctive *and* contemporary way. In some ways, this requires more skill and an even deeper understanding of what makes a place or building locally distinctive and architecturally significant.
- 4.36 This is particularly true in complex historic environments like Stroud’s Industrial Heritage Conservation Area (IHCA), where we are increasingly seeing poorly contextualised development – some of which is on a very large scale – the cumulative effect of which is posing a serious risk to the integrity of this conservation area’s character and historic significance. That this is continuing to happen, in spite of there being detailed design guidance and conservation area management proposals in place, highlights how important it is to raise awareness about what is significant and to ensure that any guidance and policy is easily accessible and routinely referred to – by planning decision makers as well as by applicants.
- 4.37 Training and awareness is key. All planning case officers should be familiar with the broad principles and intentions of design guidance and conservation area management proposals, where they do exist. Where necessary, advice about contextual design and the significance of the heritage asset in question should be sought from specialist conservation staff.

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- 4.38 Any Heritage Statement submitted in support of an application should clearly describe the nature and significance of the affected heritage asset, and set out how the proposed scheme aims to maintain or enhance this – including through reference to any design guidance or management proposals that are specific to the building or place in question.
- 4.39 Neighbourhood Development Plans and community-led design statements must accord with the NPPF, NPPG and the Local Plan. Communities should be encouraged to undertake conservation area appraisal as part of building a sound evidence base to support design guidance and policies which aim to protect and reinforce local distinctiveness and the historic environment. There may be opportunities for training or additional support for those involved with policy-writing, to help communities develop strong policies and guidelines which will protect the local character, without being overly prescriptive. Making a convincing and appealing case for high quality, contextual, contemporary design will be important.

Next steps

Strategy Priority 5: Striving to conserve and enhance our local distinctiveness.

- 3.21 The Council should be consistently delivering a message that we expect high standards of design. We need to ensure that all advice is up-to-date, compliant with both national and local policy, and is genuinely helpful and inspirational, with a view to raising design standards and protecting and enhancing our local distinctiveness – including through high quality, energy-efficient, contemporary design.
- 3.22 *A range of other options, opportunities and more detailed potential next steps are set out in the supporting **Issues & Options Discussion Paper**, which forms part of this consultation. But we think these should be the main priorities for the Heritage Action Plan:*

Action Plan Priority? Design guidance publications

Review and, where necessary, refresh and rationalise Stroud District Council's various supplementary planning advice documents, to ensure the planning authority is delivering a consistent, up-to-date and easily accessible message, which accords with the Local Plan's expectation of high design standards. In particular:

- Residential Design Guide SPG (2000)
- Householder Design Guide SPA (2007)
- Shopfronts Design Guide SPG (2011)
- Industrial Heritage Design Guide SPA (2008)
- Sustainable Construction Checklist SPD (emerging)
- Planning application Validation Checklist (emerging)

The Heritage Action Plan should identify whether any additional design guidance or supplementary planning advice is needed, in order to address particular issues or pressures or to support the implementation of policies in the Local Plan.

In conjunction, there is an opportunity to review the Council web pages, to ensure that design guidance is clearly signposted and easily accessible from all relevant pages; and to consider how the website might be used to raise the profile of design as an issue, highlighting SDC's expectations of high design standards.

Action Plan Priority? Development Management monitoring and review

Undertake a review of planning applications in conservation areas to get a better understanding of the quality and consistency of design in historic areas; to identify particularly good examples and to learn lessons from less successful results. There should be continuous periodic monitoring of permissions within conservation areas.

Action Plan Priority? Design Awards

The Council should initiate a District-wide design awards scheme, with a view to raising the profile of design quality locally. Specifically, the awards should aim to highlight and celebrate the best design solutions to development within an historic context.

The Heritage Action Plan should set out:

- the scope and objectives of the scheme
- awards categories and selection criteria
- a methodology for nominating candidates – designed to encourage participation by communities, parish councils, heritage groups and societies, architects and agents, developers, clients and individuals
- an outline for how the scheme will be implemented and who will be involved

Action Plan Priority? Training and raising awareness

Identify opportunities for training and outreach, to raise awareness of heritage and design issues and to increase skills to tackle them, both within the Council organisation and throughout the District's communities.

Consultation Questions:

There is no structured 'questionnaire' associated with this consultation. We welcome comments about any aspect of this strategy and the Issues & Options discussion paper. But the following pointers will help us, and may help you to focus your feedback.

Stakeholders: *Are there opportunities for any key stakeholders to become more involved in promoting and appraising the quality of design and development in our historic environment? What roles do they, or could they, play?*

Mechanisms, tools, initiatives, funding and resources: *Can you think of any other national or local tools and resources which could help with positively managing the quality and local distinctiveness of design and development in Stroud District? Can you think of successful examples within the District or elsewhere? Are there any pitfalls or obstacles?*

Issues and pressures: *Are you aware of any particular issues or pressures which are affecting the quality and character of design and development in our historic environment? We would most like to identify issues that are common or widespread, rather than issues that are unique to an individual building or site. Can you suggest any additional ways of addressing any issues, pressures or common pitfalls?*

Next steps and priorities for future action: *What do you think of the suggestions here*

3. Positive management: our local distinctiveness

and other opportunities identified in the Issues & Options discussion paper? Do you agree that these are reasonable priorities? Are some aspects more urgent or achievable than others? Can you envisage any obstacles? If you object to any of these ideas, what are your reasons?

Conservation Areas: a programme for their appraisal and management

- 3.24 Conservation areas are designated by local authorities and are areas of particular architectural or historic interest, the character or appearance of which it is desirable to conserve or enhance. For almost 50 years, ever since the 1967 Civic Amenities Act, conservation areas have proved a highly effective mechanism for managing change on an area-wide basis. They form the historic backcloth to national and local life and are a crucial component of local identity.

Designation and Review

- As the Local Authority, Stroud District Council has the statutory power to designate conservation areas³⁶.
 - All properties within a conservation area are required to have this recorded as a local Land Charge³⁷.
 - We are legally obliged to review our area “from time to time”, to assess whether existing designations are still justified and to identify any additional areas worthy of designation³⁸.
 - Ideally, an ‘appraisal’ of the area should be carried out at the time of designation, to explain its special architectural or historic significance³⁹.
 - The NPPF⁴⁰ advises that Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. Copies of evidence should be deposited with the Gloucestershire Historic Environment Record (HER).
- 3.25 An appraisal of the area’s character and significance is an important tool in helping to ensure that the likely impact of any proposed development is properly understood and that informed decisions are made by the Local Planning Authority in determining planning applications which might affect the area’s significance. National Planning Practice Guidance (PPG) advises that conservation area appraisals should help in developing Local Plan policies, as well as informing management plans which are specific to each conservation area; and that a good appraisal should consider what features make a positive or negative contribution to the significance of the conservation area, thereby identifying opportunities for beneficial change or the need for planning protection⁴¹.
- 3.26 Character appraisals, known as “Conservation Area Statements” (CAS), have been adopted as Supplementary Planning Advice for only 15 of our 41 conservation areas. None of these appraisals were carried out at the time of designation (all our designations were made more than 20 years ago). The Council has not carried out any appraisals since 2008. The most

³⁶ Legislation

³⁷ Reference

³⁸ Planning (Listed Buildings and Conservation Areas) Act 1990. Section 69.

³⁹ Reference

⁴⁰ NPPF, paragraph 141

⁴¹ PPG *Conserving and enhancing the Historic Environment*, paragraph 025

3. Positive management: conservation areas' appraisal and management

recently adopted CAS (Kingswood, 2014) was compiled by the local community in liaison with District Council planning and conservation officers, to support their Parish Design Statement.

- 3.27 The Stroud District Local Plan (2015) identifies the number of conservation areas with an “up-to-date” appraisal as a key indicator of the effectiveness of Local Plan policy EH10. This data is not currently monitored and there is no current programme for ongoing conservation area review or the production of Conservation Area Statements.
- 3.28 Although there is no statutory limit or definition of “up-to-date”, a review every five years is commonly taken as a benchmark, including by Historic England. Once an appraisal is in place, though, a five-yearly review may be a very simple and relatively low-resource process: in most conservation areas, there will be no need for re-writing a character appraisal and the review may simply affirm that the existing document is still fit for purpose.

Management Proposals

- Local Planning Authorities have a duty to formulate and publish proposals for the preservation and enhancement of their conservation areas⁴².
 - This is in *addition* to the obligations to make local development plan (local plan) policies for the conservation, enhancement and enjoyment of the historic environment, as set out by the NPPF⁴³.
- 3.29 Regularly reviewed appraisals, which identify threats and opportunities, can be developed into a Management Plan, which can in turn channel development pressure to conserve the special quality of the conservation area. Areas in relative economic decline and areas under particular pressure for development can benefit from management opportunities that promote beneficial change⁴⁴.
- 3.30 Traditionally, Stroud District’s CASs have included a section on design guidance and opportunities for enhancement, linked to particular issues and pressures identified for that conservation area.
- 3.31 In the case of the Industrial Heritage Conservation Area, this was developed into a more extensive Management Plan, which was adopted as a Supplementary Planning Document (SPD) in 2008, alongside a dedicated Design Guide and Character Appraisal. Despite its SPD status, the IHCA management proposals are not having the intended effect: many of the problems, issues and pressures identified a decade ago, which sparked the production of this suite of IHCA documents in the first place, continue to threaten the integrity and special historic and architectural significance of this unique conservation area. The IHCA and Stanley Mills CA are both identified as “at risk” by Historic England⁴⁵.
- 3.32 The key here is to ensure that everyone involved in managing development within conservation areas is aware of the Management Proposals and any specific guidance that has been adopted for each of the conservation areas that have them. Policy and design guidance should be relevant, clear and straightforward. But most importantly, the reasons behind them must be clear: understanding what the vulnerabilities are and how certain trends or pressures

⁴² Planning (Listed Buildings and Conservation Areas) Act 1990. Section 71.

⁴³ NPPF, paragraphs 126 and 157.

⁴⁴ Historic England *Advice Note 1: Conservation Area Designation, Appraisal and Management* (2016), paragraph 22.

⁴⁵ Historic England’s *Heritage At Risk Register* 2016

can threaten a particular conservation area's significance should make the implementation of policies and design guidance easier.

- 3.33 This means raising awareness amongst homeowners, designers, planning agents, parish councils and consultees, and most particularly the planning officers and councillors who are actively involved in making planning decisions.

Community involvement

- 3.34 There are opportunities for members of the local community to get involved with protecting and enhancing their conservation area, either individually or through groups. Nationally, some local groups have helped to prepare character appraisals and management plans for conservation areas whilst others have carried out their own assessments to identify management issues.
- 3.35 Within our District, the Kingswood CAS (adopted in 2014) was a product of liaison between SDC conservation / planning strategy officers and a community group, led by the parish council, who did field work and drafted the document. The conservation area character appraisal provided evidence to support policy and design guidance in the community's Parish Design Statement.

Further management tools and resources

- 3.36 Article 4 directions are a key tool for managing change within conservation areas. Local Planning Authorities are empowered to make an Article 4 direction to remove certain specific permitted development rights from dwellings within a conservation area. This introduces an element of planning control over some external works, which would not normally be the case. Article 4 directions are not necessarily intended to prohibit changes: they should be a tool to ensure that changes are considered and their likely impact on the character and appearance of the area can be assessed.
- 3.37 Several of the District's conservation areas are subject to Article 4 directions, most of which were introduced alongside a CAS. However, public awareness is patchy and their effectiveness in preventing inappropriate alterations has been inconsistent over the years.
- 3.38 Incorporating a comprehensive and systematic photographic survey of all Article 4 buildings into every future conservation area appraisal would improve the Local Planning Authority's ability to monitor change and enforce against breaches of planning control.

Next steps

Strategy Priority 3: Establishing a programme for the appraisal and management of conservation areas.

- 3.39 Stroud District Council should set out in the Heritage Action Plan a co-ordinated programme to review the District's conservation areas. The programme's ultimate aim should be to have an up-to-date Conservation Area Statement (CAS), consisting of character appraisal and management proposals, in place for each conservation area.
- 3.40 Improving awareness about the existence of CAS and management proposals – including training on how to use them – will also be an important part of any review programme. Encouraging community involvement will also depend upon the Council providing support and advice and helping to develop local skills and capacity.
- 3.41 *A range of other options, opportunities and more detailed potential next steps are set out in the supporting **Issues & Options Discussion Paper**, which forms part of this consultation. But we think these should be the main priorities for the Heritage Action Plan:*

Action Plan Priority? Conservation Area review

The Heritage Action Plan should set out a programme for the ongoing appraisal and review of the District's conservation areas, with the ultimate aim of having up-to-date Conservation Area Statements in place for each conservation area. The programme should set out a reasonable target for what can be achieved within the next five years and should be reviewed each time the Action Plan is refreshed.

The programme should set out which conservation areas should be prioritised, with particular preference for areas which meet one or more of the following criteria:

- Conservation Areas considered "at risk" or most vulnerable, according to the annual CAARS survey
- Conservation Areas affected by strategic site allocations in the Local Plan
- Conservation Areas in tier 1, tier 2 or tier 3 settlements, according to the Local Plan's settlement hierarchy
- Conservation Areas within "Neighbourhood Areas" (the defined extent of an emerging Neighbourhood Development Plan)

Action Plan Priority? Local Listing

The identification of undesignated heritage assets of local significance should be incorporated into any future conservation area appraisals, with a view to including those assets in a Local Heritage List.

Action Plan Priority? Neighbourhood Planning and community involvement

Communities who are engaged in producing Neighbourhood Development Plans (NDPs) should consider undertaking an appraisal of any conservation area that sits within their Neighbourhood Area, as part of their NDP's heritage evidence base. Neighbourhood Planning Groups are able to access various funding sources to help them assemble a robust evidence base, which may allow them to commission professional expertise to supplement local skills and knowledge.

3. Positive management: conservation areas' appraisal and management

Whilst towns and parishes wishing to produce a Community, Village or Parish Design Statement may not have access to equivalent financial resources, they may still be able to make use of local knowledge and enthusiasm. Communities should consider undertaking a conservation area appraisal in tandem with their Design Statement, to produce a robust, joined-up and comprehensive package of design and conservation guidance for their area. This offers great opportunities to double-up on public consultation and information gathering, amongst other things.

Stroud District Council will take an active role in advising and supporting local communities in their conservation area appraisal by sharing evidence and information and ensuring that any design guidance and management proposals fit with the strategic policies of the Stroud Local Plan and with national policy.

Consultation Questions:

There is no structured 'questionnaire' associated with this consultation. We welcome comments about any aspect of this strategy and the Issues & Options discussion paper. But the following pointers will help us, and may help you to focus your feedback.

Mechanisms, tools, initiatives, funding and resources: can you think of any other national or local tools and resources which could help with positively managing the District's conservation areas? Can you think of successful examples within the District or elsewhere? Are there any pitfalls or obstacles?

Issues and pressures: are you aware of any particular issues or pressures which are affecting conservation areas in Stroud District? We would most like to identify issues that are common or widespread, rather than issues that are unique to an individual building, site or structure. Can you suggest any additional ways of addressing issues, pressures or vulnerabilities that affect conservation areas in Stroud District?

Priorities for future action: what do you think of the suggestions? Do you agree that these are reasonable priorities? Are some more urgent or achievable than others? Can you envisage any obstacles? If you object to any of these ideas, what are your reasons?

Non-designated heritage assets of local significance

- 3.42 The vast majority of buildings and structures have little or no heritage significance and so do not constitute “heritage assets”. But a minority have enough heritage interest for their significance to be a material consideration in the planning process. In Stroud District we are lucky to have a rich historic environment, with a large number of designated heritage assets. But almost every one of our settlements will have at least a handful of heritage assets which, whilst not significant enough to warrant statutory designation, nevertheless have local historic interest.
- The NPPF requires local planning authorities to take into account the effect of proposed development on the significance of any “non-designated heritage asset” when determining applications⁴⁶. This means that **non-designated heritage assets are a material consideration in the planning process**: their significance is one part of the balanced judgement that the local planning authority must make when determining an application for development.
 - The Stroud District Local Plan (Policy ES10) supports **development which will protect and, where appropriate, enhance the heritage significance and setting of locally identified heritage assets**.
 - The Local Plan also requires a **‘heritage statement’ to accompany any application for development which would affect a heritage asset or its setting**, including non-designated and locally identified heritage assets. The statement should describe the nature and significance of the affected asset(s) and their setting, and explain how the proposed development would protect or enhance them in a way that is appropriate to their significance.
 - **Local planning authorities may identify non-designated heritage assets**. These are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. In some areas, local authorities identify some non-designated heritage assets as ‘locally listed’.⁴⁷

Identifying our local heritage assets

- 3.43 As the Local Planning Authority, Stroud District Council requires applications for development affecting a locally identified heritage asset to be justified in a ‘heritage statement’⁴⁸. But what exactly is a “locally identified heritage asset”? And how are they actually identified?
- 3.44 At present, local heritage assets tend to be identified on an *ad hoc* basis through the planning process, as individual development proposals are considered. This might be during pre-application discussions, or during consideration of a planning application. A potential heritage

⁴⁶ NPPF, paragraph 135

⁴⁷ PPG *Conserving and enhancing the Historic Environment*, paragraph 039

⁴⁸ Stroud District Local Plan policy ES10: *Valuing our Historic Environment and Assets*

3. Positive management: Non-designated heritage assets of local significance

asset might be flagged up by a planning case officer, by a conservation officer, by the applicant or through public comment – for example a comment by a consultee, amenity society, parish council etc. At present, potential heritage assets are not assessed against consistent, objective criteria.

3.45 Local planning authorities are empowered to create a “local list” of non-designated heritage assets, an approach which is supported through the NPPF, by Historic England and by Civic Voice (the national umbrella organisation for local civic societies). Local listing has several benefits:

- ✓ Speeding up the planning process: if an asset is already identified in a local list, it can be quickly identified at the outset of a planning proposal by both the applicant and the planning authority.
- ✓ Cutting down on dispute: Whether or not a building, site or structure constitutes a “heritage asset” will also be less open to dispute if it has been assessed against consistent and objective selection criteria and has been ‘adopted’ via a proper process.
- ✓ The speed and robustness of *ad hoc* identification may also be improved by having a local list: ideally, in the case of buildings, their significance should be judged against published criteria⁴⁹, which may be generated as part of the process of producing a local list.
- ✓ Building a better picture: a local list can help to complete the overall picture of our area’s heritage significance and will form part of an evidence base for future planning decisions and policy-making at both community- and District-level.

3.46 Or, in PPG terms: *“Local lists incorporated into Local Plans can be a positive way for the local planning authority to identify non-designated heritage assets against consistent criteria so as to improve the predictability of the potential for sustainable development”⁵⁰.*

Local Heritage Listing: a partnership approach

3.47 The creation of a local list provides an opportunity for our local communities to work in partnership with the District Council to identify local heritage assets.

- Helps to build and reinforce a sense of local identity and distinctiveness by identifying parts of the historic environment valued by the community at the local level
- Offers potential to make use of expertise, knowledge and resources outside the Council
- An opportunity to improve communication, build positive partnerships between the District Council and local communities and spread awareness about valuing our historic environment and assets

3.48 The ‘blanket’ survey of the whole District to identify any potential assets is an enormous task and would require considerable resources. There are certainly benefits to having a comprehensive District-wide list. But there are alternatives:

⁴⁹ PPG *Conserving and enhancing the Historic Environment*, paragraph 041

⁵⁰ PPG *Conserving and enhancing the Historic Environment*, paragraph 041

Community involvement and Neighbourhood Planning Groups

- 3.49 Local heritage lists are usually ‘owned’ and maintained by the local authority, having been given formal status by adopting selection criteria either via the Local Plan or a Supplementary Planning Document⁵¹. Local communities, perhaps galvanised by a parish council or civic society, can get involved in surveying their area and identifying potential candidates for the list, based on standardised District-wide selection criteria.
- 3.50 Linking a local survey of potential heritage assets to an ongoing conservation area appraisal provides an opportunity to pool resources and maximise public engagement in identifying what is significant and valued about the local historic environment.
- 3.51 But it is also possible for communities to initiate a local list for their area through their Neighbourhood Development Plan (NDP) and to incorporate locally specific selection criteria into the NDP. The Stroud Town Centre NDP is one example where this approach has been taken. Neighbourhood Planning Groups are able to access various funding sources to help them assemble a robust evidence base, which may allow them to commission professional expertise to supplement local skills and knowledge.
- 3.52 **Historic England** provides guidance for local authorities and communities to help with introducing a local list in their area or making changes to an existing list. See their **Advice Note 7 – Local Heritage Listing**.

Next steps

Strategy Priority 4: Identifying and protecting non-designated heritage assets of local significance.

- 3.53 Stroud District Council should set out in the Heritage Action Plan a co-ordinated programme for the identification of heritage assets of local significance, so that their heritage interest can be better identified as a material consideration when dealing with development proposals which might affect them.

*A range of other options, opportunities and more detailed potential next steps are set out in the supporting **Issues & Options Discussion Paper**, which forms part of this consultation. But we think these should be the main priorities for the Heritage Action Plan:*

Action Plan Priority? A Stroud District Local Heritage List

The Council should initiate the creation of a “Local List” of non designated heritage assets of local significance by adopting a Supplementary Planning Document (SPD), which should set out how the list will be set up and run, and explain what will be the implications for any asset added to the list.

Including:

- Objective selection criteria for determining which heritage assets can be added to the Stroud District local list;

⁵¹ Historic England *Advice Note 7: Local Heritage Listing*; and PPG *Conserving and enhancing the Historic Environment*, paragraph 041

3. Positive management: Non-designated heritage assets of local significance

- A methodology for identifying potential candidates for the list, assessing their suitability and then formally 'adopting' them into the local list;
- How and where the list will be published;
- How communities, neighbourhood groups, civic societies, town and parish councils and others can be involved in the initiation of local surveys and the maintenance of their area's local list;
- The relationship between the Stroud District-wide Local Heritage List and any pre-existing or subsequently created neighbourhood- or parish-based lists.

Action Plan Priority? Neighbourhood Planning and community involvement

The Council should encourage communities who are engaged in producing Neighbourhood Development Plans (NDPs) to consider incorporating a policy on local heritage listing, including their own locally appropriate selection criteria.

- A survey of the neighbourhood area could be undertaken as part of the NDP's heritage evidence base. A local heritage list could then be adopted via the NDP process.
- Alternatively, once an NDP is adopted, assets could subsequently be added to the local list – either piecemeal or comprehensively – according to the policy's selection criteria and an agreed mechanism for ratification.

Stroud District Council will take an active role in advising and supporting local communities in setting up a local heritage list by sharing evidence and information and ensuring that the local selection criteria and proposed methodology accord broadly with any District-wide equivalents and with national guidance.

Consultation Questions:

There is no structured 'questionnaire' associated with this consultation. We welcome comments about any aspect of this strategy and the Issues & Options discussion paper. But the following pointers will help us, and may help you to focus your feedback.

Partnership approach? *What do you think of the proposed 'partnership' approach? Will communities be receptive? Is there enough local interest? What do you think about the proposed linkage with Neighbourhood Plans?*

Have we missed any key stakeholders that could or should be involved? What benefits might be gained from other private, public or voluntary/charity sector involvement in identifying and managing local heritage assets?

Mechanisms, tools, initiatives, funding and resources: *can you think of any other national or local tools and resources which could help with identifying local heritage assets or creating a local heritage list? Can you think of successful examples elsewhere? Are there any pitfalls or obstacles?*

Priorities for future action: *Do you agree that 'local listing' is a reasonable priority? Can you envisage any obstacles? If you object to any of these ideas, what are your reasons?*

Implementation and monitoring

This draft Heritage Strategy and the **Issues & Options Discussion Paper** will be published for six weeks' public consultation. The consultation will seek views about whether the priorities and big issues identified within the draft Strategy are the right things to focus on; what options exist for tackling them; any practical or financial implications; and whether there are other options or opportunities that have been missed by either the draft Strategy or the discussion paper.

The **Heritage Strategy**, once adopted as Supplementary Planning Advice (SPA) will allow the Council to set informed priorities in relation to the conservation, management and monitoring of the District's heritage assets and the allocation of resources. As part of this, it is important to be able to monitor progress and measure performance against key priorities.

Implementing the Strategy will directly affect the Council's operation, particularly in its development management and strategic planning role as the local planning authority. However, it will also require a wide range of private, public and voluntary bodies to work together. The Council will work with other stakeholders, including Historic England and the County Council, with parish councils and neighbourhood groups, building preservation trusts, civic societies and other specialists to identify needs and opportunities and to support particular projects however we can. In particular, the Council recognises and supports the development of neighbourhood plans, which have a key role to play in the management and shaping of our historic environment. If the Council chooses to elect a Heritage Champion, they will have a key role in promoting the aims and priorities of the Strategy and in building partnerships.

Action Plan

To support the Heritage Strategy, a Council **Heritage Action Plan** will be produced, consisting of a programme of works relating to priorities identified in the Strategy itself. Feedback from public consultation on the draft Strategy and discussion paper will help to inform the first Action Plan, which should be prepared in accordance with the final Heritage Strategy.

The intention is that the Strategy and supporting Action Plan will enable better and more efficient performance and more effectively targeted action, including through the identification of opportunities for partnership working, funding, training, education and capacity-building – for our communities as well as for those operating within Stroud District Council.

The Action Plan will set out realistic objectives and actions for the following five years. Performance will be monitored, with an annual progress report to Environment Committee, and the Action Plan will be periodically refreshed with a rolling five year timeframe.

Monitoring framework

The Local Plan sets out five key indicators for measuring the success of Policy ES10 (and the Heritage Strategy) and how effectively the policy influences planning decisions (SDLP Appendix 1, p184). These should be monitored year by year. A performance appraisal will form part of the periodic review and refresh of the Heritage Action Plan, helping to inform future actions and priorities.

There will be other targets and indicators to monitor progress against the actions identified in the Action Plan and to help with appraising performance against the Strategy's main priorities. So this draft monitoring framework will be developed further, following public consultation.

Local Plan Policy ES10: Valuing our historic environment and assets	
Indicator:	Mechanism / data source:
1. The number of listed buildings	National Heritage List for England.
2. The number of heritage assets at risk	National Heritage at Risk Register (HAR), annually. Stroud District Buildings at Risk Register (BAR).
3. The number of non-designated heritage assets (these can be, but are not always, "locally listed")	Action required.
4. The number of conservation areas with an up-to-date appraisal and heritage at risk survey (CAARS)	National Conservation Areas At Risk Survey (CAARS), annually.
5. The number of instances of substantial harm to non-designated heritage assets	Action required.

The following actions are required in order to enact this part of the Local Plan's monitoring framework:

Action Plan Priority? Monitoring non-designated heritage assets of local significance

The Stroud District Local Plan identifies the "number of non-designated heritage assets" in the District and the "number of instances of substantial harm to non-designated heritage assets" as key indicators for monitoring the effectiveness policy ES10.

A mechanism should be established to ensure that data about the following is routinely gathered, recorded and incorporated into any future monitoring framework or annual reporting of Local Plan indicators and / or the Heritage Strategy and Action Plan:

- the number of assets identified as 'locally listed'
- the number of planning applications concerning assets that are 'locally listed'

A methodology for identifying instances of substantial harm to non-designated heritage assets will also need to be developed.

