

A Heritage Strategy for Stroud District

Issues and Options Discussion Paper for
Consultation

January 2017

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Consultation on a Heritage Strategy for Stroud District

This discussion paper has been produced as background information to support public consultation on a draft Heritage Strategy. This paper looks at some of the issues, opportunities and potential next steps that relate to various types of heritage asset within our District. These issues and opportunities have helped to set the draft Strategy's priorities; but the range of issues, options and opportunities covered here is broader than what is contained within the draft Strategy itself.

It is envisaged that the final Heritage Strategy will be accompanied by an Action Plan, which will focus principally on things that the Council will aim to do within the first five years after the Strategy's adoption. This will be a realistic programme of works, initiatives and actions with a five year time horizon. The Action Plan will be refreshed periodically.

There is no structured questionnaire to accompany consultation on the draft Heritage Strategy – but the document does include some questions which may be useful in helping you to frame your comments, and to help us receive useful feedback. This discussion paper is intended to provide some context and additional information to help you further. We want to know whether the Strategy's priorities are right, and whether the suggested actions and next steps are the best things to focus on. We also want to know if we have missed something.

We welcome comments on both the draft Strategy and the discussion paper.

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.

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

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.**

0.14 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:

- ❖ **Understanding** our heritage and its significance.
- ❖ **Capitalising** on our heritage: identifying ways in which our historic environment really works as an 'asset' with cultural, economic, social and environmental value.
- ❖ **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.

Capitalising: valuing our historic environment and assets

- 1.1 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

- 1.2 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.

- 1.3 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

- 1.4 **Economic benefits: key findings, opportunities, potential next steps**

- Our built heritage is a strong USP when it comes to encouraging the growth of creative industries and attracting businesses to re-locate or start up
- 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"*⁵
- 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 assets⁶
- 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
- Opportunities exist through Strategic Site Allocations and Employment Regeneration Sites (policy EI2) in the Local Plan to secure the long term future of several heritage assets, to boost their economic productivity and to enhance the historic built and natural environment. At Sharpness Docks; Dudbridge and Cheapside (Stroud); Ham Mill, Brimscombe Mill, Brimscombe Port, Dockyard Works and Wimberley Mills (Brimmscombe and Thrupp) – including any future development briefs, design codes or masterplans.

⁵ Culture White Paper 2016 DCMS

⁶ Stroud District Local Plan 2015. 'Key Issue 79', Chapter 1.

- Stroud District Council took part in a pilot Brownfield Register project, which may become a national initiative: the register identifies developable brownfield (previously developed) land throughout the District – much of which lies within areas of historic interest. Many of these sites offer opportunities for environmental enhancement as well as development to boost economic productivity
- The Cotswold Canals restoration project
- The Stroud Valleys Initiative: SDC supported by the Gloucestershire LEP, the County Council, Environment Agency and the Homes & Communities Agency. Aiming to remove barriers to development on a string of regeneration sites, enabling investment in homes and jobs to take place.
- The Local Plan⁷ contains eight ‘mini visions’ and eight sets of guiding principles, which provide a high level steer for how the Plan is expected to shape the future of our District’s eight distinctive ‘parish clusters’. The visions and guiding principles for several of these clusters places particular emphasis on conserving and enhancing heritage. Including:
 - The Plan 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
 - The 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
 - The Plan highlights the importance of the historic environment to the Cotswold ‘brand’ and tourism offer
- Forthcoming review and update of the Council’s Jobs and Growth Strategy
- Forthcoming review of the Council’s Environment Strategy
- Forthcoming Town Centres Study (Stroud District Council), looking at the long term future of town centres in light of retailing trends and the changing nature of the ‘high street’
- Continuing to build close links with film and TV industry through Creative England

Consultation Question:

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 any specific examples, illustrations or opportunities?

Wellbeing

- 1.5 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.

⁷ Stroud District Local Plan 2015. ‘Vision 1.1’ and ‘Guiding Principles’ for the Stroud Valleys, pages 42-44.

1.6 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

1.7 **Wellbeing benefits: key findings, opportunities, potential next steps**

- 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 adulthood⁸. Encouraging access by youngsters is a way of fostering a lifelong interest and sense of value
- 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 expectancy⁹.
- Local heritage listing and the identification of locally important heritage assets
- Stroud District’s Rodborough Common SAC mitigation strategy
- The emerging Stroud District Green Infrastructure Strategy (supplementary planning advice) offers an opportunity to highlight the recreational benefits of historic landscapes, parks and open spaces in historic areas
- Volunteering in support of projects such as the Cotswold Canals restoration
- Educational engagement
- SDC Corporate Delivery Plan identifies the delivery of “physical activity and learning programmes” at the Museum in the Park for 2,000 people from schools, care homes and community groups and the completion of the Museum’s walled garden project as key actions for 2015-16.
- Cultural and community facilities, housed within historic buildings – including Council owned assets such as the Museum in the Park, the Stroud Subscription Rooms; Town and Parish councils also play an important role in owning and managing historic assets.

Consultation Question:

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

⁸ *Values and Benefits of Heritage*, 2016. Research review by HLF. 2.3, p 13

⁹ *Values and Benefits of Heritage*, 2016. Research review by HLF. 3.1, p 14-15.

wellbeing? Can you think of any specific examples, illustrations or opportunities?

Building a positive legacy for the future

- 1.8 “Sustainable development” is at the 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 environment¹⁰. The historic environment, our built, natural and cultural heritage, has a key role to play in sustainable development - bringing about “change for the better”.
- 1.9 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).
- 1.10 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 significance¹¹;
 - 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 in¹²;
 - New development should seek opportunities to draw on the historic environment in order to maintain and *enhance* local character and distinctiveness¹³.
- 1.11 **Building a positive legacy: key findings, opportunities, potential next steps**
- 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
 - 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
 - Opportunities exist through Strategic Site Allocations and Employment Regeneration Sites in the Local Plan to secure the long term future of several heritage assets, to boost their economic productivity and to enhance the historic built and natural environment. At Sharpness Docks; Dudbridge and Cheapside (Stroud); Ham Mill, Brimscombe Mill,

¹⁰ Ministerial foreword to the NPPF

¹¹ *Stroud District Local Plan*, Policy ES10 and paragraph 6.56

¹² *Stroud District Local Plan*, paragraph 6.53

¹³ *Stroud District Local Plan*, paragraph 6.56

Brimscombe Port, Dockyard Works and Wimberley Mills (Brimscombe and Thrupp) – including any future development briefs, design codes or masterplans.

- Section 607 of the Housing Act 1985 (as amended) required local housing authorities, in preparing any proposals for the provision of housing accommodation or in taking action under the Housing Acts, to have regard to certain environmental considerations:
 - The beauty of the landscape or countryside or the other amenities of the locality
 - The desirability of preserving existing works of architectural, historic or artistic interest
- The Council’s own building and development projects: including council housing; involvement in the development of Brimscombe Port; asset/estates management
- Design guidance?
- Neighbourhood Development Plans and Community / Parish Design Statements offer opportunities for communities to help shape development in their area and to identify local heritage assets of particular value to their community and to highlight distinctive architectural features or characteristics of their locality
- Conservation Area Statements: appraisal of character and significance, coupled with guidance and management proposals which address issues specific to each conservation area
- The emerging Stroud District Green Infrastructure Strategy (supplementary planning advice) is an opportunity to highlight the recreational and biodiversity benefits that historic buildings and historic areas can offer
- The Council could consider nominating a Heritage Champion (sometimes also known as a “Design and Historic Environment Champion”) to be an advocate for all aspects of the historic environment in our area and to promote the role that heritage can play in achieving the Council’s wider objectives¹⁴

Consultation Question:

*Can you think of other ways that our heritage contributes to sustainable development?
Can you think of any specific examples, illustrations or opportunities?*

¹⁴ Historic England *Heritage Champions Handbook*, 2016 <https://historicengland.org.uk/images-books/publications/heritage-champions-handbook/>

Positive management: identifying issues and opportunities

- 2.1 This part of the Strategy investigates the vulnerabilities, issues and pressures that face Stroud's diverse heritage assets, how they are currently addressed, and whether there are opportunities for change.
- 2.2 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.
- 2.3 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.
- 2.4 To do this, we need to look at:
 - **The District Council's role**, responsibilities, obligations and powers as a local authority in the management of the historic environment and the various types of heritage asset, both designated and non-designated. How we currently fulfil our role. What do we do? What don't we do? What could be done better or differently?
 - **Stakeholders**: what roles do other stakeholders play in the management of the District's heritage assets and historic environment? Who are the key stakeholders and what do they do?
 - **Tools and resources**: nationally and locally, what potential 'tools' and resources are available for the positive management of different kinds of heritage assets? Is there 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?
 - **Next steps...** Suggesting how and where resources could be prioritised in the future, in order to address the issues and pressures facing Stroud's historic environment. Identifying actions to be taken forward in the Action Plan.

What are our big issues?

- 2.5 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.
- 2.6 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.
- 2.7 Through the Strategy, we intend to 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.

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.

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):

Heritage assets on the 2016 HAR register

Stanley Mills CA	Conservation Area	
Stroud Industrial Heritage CA	Conservation Area	
Church of St James, Fretherne with Saul	Listed building	II*
Church of St Giles, High Street, Hillesley, Hillesley and Tresham	Listed building	II
Church of St Mary the Virgin, Church Lane, Berkeley	Listed building	I
Church of St John the Baptist, B4072, Edge, Painswick	Listed building	II
Church of St Andrew, Whitminster	Listed building	II*
Church of St Mary Magdalene, Church Place, Rodborough, Stroud	Listed building	II*
Bowl barrow 450 metres south east of Upper Hyde Farm, Minchinhampton	Scheduled Monument	
Gatcombe long barrow, 400 metres east of Gatcombe Farm, Minchinhampton	Scheduled Monument	
Bowl barrow 330 metres north of Symonds' Hall Farm, Wotton-	Scheduled Monument	

under-Edge		
Bowl barrow 720 metres south east of Longwood Farm, Woodchester	Scheduled Monument	
St Mary's House, London Road, Chalford	Listed building	II*
Main building at Stanley Mills, Ryeford, King's Stanley	Listed building	I
Old Mill Building at Longfords Mills, Avening Valley, Minchinhampton	Listed building	II*
Former Saxon church to west of Priory House, Leonard Stanley	Scheduled Monument	
Woodchester Mansion, Woodchester	Listed building	I

But there are gaps in our knowledge and understanding about the condition and vulnerability of Stroud's wider historic environment and the Council does not have a coordinated 'Buildings at Risk' programme or a publicly accessible register of "at risk" assets within the District. The national HAR does not provide a complete picture of Stroud District's heritage assets: the HAR does not, for example, monitor Grade II listed buildings (other than listed places of worship) and does not touch upon non-designated assets (heritage assets of local significance). There are a variety of 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.

Whilst individuals often feel strongly about being able to alter and upgrade their homes as they see fit, many communities tend to place a high priority on ensuring that development and alterations in conservation areas remains "in keeping" – and it does seem that many regard conservative and traditional design as being the best (or only) way of achieving this.

Meanwhile, new building technologies, improving the sustainability of construction materials and 'greening' the way that buildings function are inevitably impacting on the appearance and composition of next generation buildings in the District. We need to find ways to reconcile this with the traditional architectural character of our buildings, towns and villages, which is such an important part of the District's local distinctiveness and our high quality surroundings.

The effects and underlying causes of this erosion of local distinctiveness are intertwined with a range of issues and opportunities, relating to many different types of heritage asset.

Issues identified in the Stroud District Local Plan:

- 2.8 At the outset of the plan-making process, a series of issues and pressures were identified, which helped to shape the Local Plan's strategic objectives and its overall vision for the future – which in turn have shaped the detailed policies now contained in the final Plan. Very many

of these issues relate in some way to Stroud District's exceptional historic environment and our built and natural heritage.

Meeting the District's identified future housing needs:

- [8] The District has a high quality environment and is an attractive place to live. There is a need to consider how housing needs can be met without compromising the high quality environment.
- [11] We need to consider the quality and types of homes that are built, and how the District's existing housing stock is likely to be affected by future trends. How should we respond to pressures to extend or subdivide existing houses?

Maintaining and improving the sustainability of our villages:

- [20] Some modern farming practices can undermine environmental quality in ways that differ from traditional land management techniques; some have detrimental visual impacts upon the countryside / landscape
- [22] There is perceived loss of local character and distinctiveness in many villages where poorly designed "anywhere" housing design has been introduced

Providing for job opportunities across the District:

- [46] A large proportion of the District's [current] protected employment land lies along the valley bottoms to the east, west and south of Stroud [within or adjacent to IHCA], where sites are constrained and transport and infrastructure are inconvenient for many traditional industries
- [47] Many of the District's historic mills are unsuited to modern industry, and some have fallen vacant, but converting them solely for other uses could undermine the District's employment base
- [49] The high quality environment constrains the location of some forms of commercial development, but also provides opportunities for others

Improving the vitality and viability of our town centres:

- [61] Our town centres benefit from high concentrations of historic buildings, which contributes greatly to the character and quality of the townscape; but equally this can place restrictions on development, floorspace and capacity for growth and change

Developing the tourism potential of the District:

- [63] The District has a successful tourism industry, but underperforms considering the quality of our assets and the District's offer

Supporting and capitalising on the District's artistic and cultural assets:

- [68] The Stroud area has attracted artists, writers and craftspeople for over a century and today we have an exceptionally rich creative arts scene, which 'punches above its weight' nationally and internationally

Conserving and enhancing Stroud District's countryside and biodiversity:

- [71] Half the District falls within the Cotswold Area of Outstanding Natural Beauty, which is recognised as a nationally important landscape, while the Severn estuary and its foreshore is an internationally protected wetland and wildfowl habitat
- [74] This high quality environment places constraints on all kinds of development: where it should go, what it should look like, and how it impacts on the surroundings. The challenge is how to accommodate modern needs in this environment without harming its character or value

Protecting and enhancing our historic environment:

- [78] Stroud District's built heritage is a huge part of its character, identity and interest. We have nearly 5,000 individual listed buildings or structures (many of which are homes and business premises), 42 conservation areas, 14 historic parks or gardens and many sites of archaeological interest.
- [79] Often the land most in demand for new development is also that at the heart of our environmental assets in the built environment (e.g. town centre conservation areas and the industrial valley bottoms, which are rich in industrial heritage).
- [80] There is increasing pressure/desire for historic buildings to adapt to meet modern demands (e.g. climate change, new activities and uses). We need to find ways to achieve this without compromising the integrity of the historic asset.
- [81] Statistically, scheduled monuments are at greater risk of loss or damage in the AONB than those in national parks or other protected landscapes; the Cotswold AONB is a living, working landscape, which is subject to modern farming and interventions that can sometimes be damaging to archaeology and above-ground historic relics.
- [82] New building technologies, improving the sustainability of construction materials and 'greening' the way that buildings function will all inevitably impact on the appearance and composition of 'next generation' buildings in the District. We need to find ways to reconcile this with the traditional architectural character of our buildings, towns and villages, which is such an important part of the District's local distinctiveness and our high quality surroundings.
- [83] Over the past two or three decades, economic pressures, global markets and 'anywhere' standard design in many new developments has begun to water down our area's local distinctiveness. We need to consider how the District's 'sense of place' should be maintained and enhanced.

Contributing to the provision of renewable and low-carbon energy generation in the District:

- [86] Retro-fitting older buildings to become more energy efficient is not always a viable option and does not produce the best results. This is further complicated by the potential impact that modifications could have on the District's high number of historic buildings and historic areas
- [87, 88] The District's current capacity for renewable and low-carbon energy generation is insufficient to effectively reduce carbon emissions. Increasing our capacity could impact on the District's high quality natural and built environment

Ensuring that the Cotswold Canals restoration plays a positive role in the District:

- [89, 91] The Council is committed to progressing the restoration of the historic Stroudwater Navigation and the Thames & Severn Canal, collectively known as the 'Cotswold Canals'. The challenge is to make the most of the canal restoration and its regeneration potential, whilst maintaining and enhancing key employment land and conserving the rural character of much of the route.

Consultation Question:

Are there big issues that we have missed? How might we go about tackling them? Can you think of any specific examples, illustrations or opportunities? What should be prioritised in the Heritage Strategy and Action Plan?

Listed Buildings

A Listed Building is a structure deemed to be a building of ‘special architectural or historic interest.’ The older and rarer a building, the more likely it is to be listed. Listed buildings are divided into three Grades: II, II and I. These Grades generally reflect the buildings’ national importance, with the vast majority (more than 90%) being Grade II. But all listed buildings, no matter what their Grade, are legally protected to guard against harmful alterations. The legislation that protects listed buildings is designed to control change, rather than to prevent it, since almost all buildings need to adapt from time to time.*

Consent must be obtained in advance of carrying out any demolition or any alterations which would affect the building’s character or significance. It is a criminal offence to carry out such work without Listed Building Consent (LBC). In theory, like-for-like repairs don’t need LBC, since they should not affect the building’s character – but this is a matter of judgment about the extent and detail of the work.

As a rule, all buildings dating from before 1700 are Listed, as are most built between 1700 and 1840, though there is more selectivity. Whilst very few buildings constructed after 1840 are deemed to be eligible for Listing, the numbers are increasing.

Many buildings were Listed without internal inspection, and it has become a common misconception that only their fronts are listed. In fact, the whole of the building, no matter what the Grade, has full legal protection, inside and out, back and front. Even modern additions to the building, no matter how unsightly, are listed.

As well as the main building, any structures that were connected with the Listed building before 1948 (for example, barns or washhouses, walls and fences) are also legally protected by what is known as ‘curtilage listing’. Curtilage structures will probably not be mentioned in the list description, which can be a source of confusion.

What have we got?

- ★ **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 **6** have more listed buildings than us.
- ★ **4,368** addresses in Stroud District are within Listed Buildings (**3,090** of which are residential properties), meaning that a huge number of homes and workplaces are affected by listing.
- ★ **10** of the District’s Grade I or II* Listed Buildings or listed “places of worship” are considered to be “at risk” according to Historic England – that is 2.9% of all the “at risk” Listed Buildings in the South West region¹⁵.

¹⁵ Historic England’s *Heritage At Risk Register* monitors only Grade I and II* listed buildings and listed places of worship (of all grades). The 2016 Register identified 339 such buildings as “at risk” in the South West.

Stroud District is particularly rich in listed buildings. In terms of pure numbers, only six local authorities in the South West have more listed buildings than Stroud, including the vast unitary (county) areas of Wiltshire and Cornwall, which each have more than 12,000 listed buildings; then Cotswold (4,986), South Somerset (4,661), West Dorset (4,266) and Bath & Northeast Somerset (3,747)¹⁶. When you consider the size and rural nature of our District, this equates to an exceptional 'density' of listed buildings packed into our 472 square kilometres: on average, we have nearly 7 listed buildings per sqkm. That compares to Cotswold District's 4.3 per sqkm and is roughly double the South West average (3.7 per sqkm). Across England as a whole, the average is 2.9 listed buildings per sqkm.

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, 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, 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. 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).

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*.

The Council's role

Development management

- The local planning authority is responsible for determining applications for Listed Building Consent (LBC), which is required for any alteration to a listed building which would affect its character and for demolition.
- Stroud District Council dealt with 254 LBC applications last year (1 April 2015 – 31 March 2016). The number of LBC applications has consistently been in the high 200s for the past five years. In the year 2014-15, LBC applications accounted for 16.3% of all planning applications dealt with by Stroud District Council; nationally, the proportion is 7.3% and across the South West the average is 11%.
- When making a decision concerning a listed building, a local planning authority **must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses**. This obligation applies to all decisions concerning listed buildings, including listed building consent and planning

¹⁶ Historic England *Heritage Counts* 2015

applications for development that affects a listed building or its setting¹⁷. Decision-making policies in the NPPF, the Local Plan or Neighbourhood Development Plan should be applied, but they cannot be taken to override or avoid this statutory obligation to have “special regard”.

- The local planning authority is required to notify Historic England when dealing with applications for listed building consent or planning permission where:
 - * proposals involve the total or partial demolition or material alteration to a Grade I or II* listed building¹⁸
 - * proposals involve total demolition of a Grade II listed building; or the demolition of its principal external wall; or the demolition of all or a substantial part of its interior¹⁹
 - * development is likely to affect the setting of a Grade I or II* listed building²⁰
 - * the listed building consent application is being made by the local planning authority; the application may then be referred to the Secretary of State for determination if the local authority is minded to grant itself consent, in spite of objection by Historic England or one of the National Amenity Societies²¹
- The local planning authority is required to notify the National Amenity Societies when dealing with applications for listed building consent where proposals involve the total demolition of a listed building (of any Grade), or works of alteration which comprise or include the demolition of any part of a listed building.²²

Buildings at Risk

- The Stroud District Local Plan (2015) identifies the number of listed buildings and the number of heritage assets “at risk” as key indicators of the effectiveness of Local Plan policy EH10. This data is not currently monitored and there is no current “Buildings at Risk” programme.
- 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 bodies²³.

¹⁷ Sections 16 and 66 of the *Planning (Listed Buildings and Conservation Areas) Act, 1990*. “Preservation” in this context means not harming the building’s special architectural or historic interest and significance, as opposed to keeping it entirely unchanged.

¹⁸ Schedule 4(q) of the *Town and Country Planning (Development Management Procedure) (England) Order, 2015*

¹⁹ *Arrangements for handling heritage applications: Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction, 2015*.

²⁰ Regulation 5A(3) of the *Planning (Listed Buildings and Conservation Areas) (England) Regulations, 1990*

²¹ *Arrangements for handling heritage applications: Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction, 2015. The Planning (Listed Buildings and Conservation Areas) (Amendment) (England) Regulations 2015*

²² *Arrangements for handling heritage applications: Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction, 2015*. The National Amenity Societies are: the Society for the Protection of Ancient Buildings, the Ancient Monuments Society, the Council for British Archaeology, the Georgian Group, the Victorian Society and the Twentieth Century Society

²³ Historic England does not monitor Grade II listed buildings through their national HAR programme, except for listed places of worship (hence only two of our Grade II buildings appear on the Register). So the national HAR completes only part of the buildings at risk picture.

- Stroud District Council has a range of powers to intervene where listed buildings are subject to damage, neglect or deterioration:
 - Urgent Works Notices (S.54²⁴) can secure emergency or immediate repairs to those buildings or parts of buildings which are unoccupied.
 - A Repairs Notice (S.48²⁵) can only be served on a listed building and can secure much more extensive repairs, but the LPA must be prepared to exercise powers of compulsory purchase should the owner not co-operate.
 - S.47²⁶ enables the local authority to compulsorily purchase a listed building which is subject to damage, neglect or deterioration. A Compulsory Purchase Order (CPO) requires confirmation by the Secretary of State.
 - Under its general planning powers an LPA can serve a Section 215 notice (*Town and Country Planning Act 1990*) on the owner or occupier where the building or land is adversely affecting the amenity of the area and can require them to clean up the building or site. Commonly known as a “Tidy-up notice”.
 - Local authorities can also exercise Housing powers to carry out repairs and adaptations bring empty listed buildings back into productive use to provide homes –
 - by taking over management control of the property through S.132 “Empty Dwelling Management Orders” (EMDO)²⁷
 - by purchasing through S.17²⁸ “Acquisition of land for housing purposes”, either through agreement with the owner or by CPO (subject to authorisation by the Secretary of State)
 - Enforced Sale procedure²⁹ is one of the main tools used to deal with empty homes, but can apply to any vacant property which meets the criteria. Its use can be quicker than CPO as a means of recovering debts incurred by the local authority in exercising statutory actions.
 - Other powers available to deal with dangerous buildings and structures Dangerous Structures Order, Emergency Measures, (as detailed here: <https://content.historicengland.org.uk/images-books/publications/stoppingtherot/heag046b-stopping-the-rot.pdf/>)
 - 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.

Resource implications:

- S.55 allows for the costs of the works required by an Urgent Works Notice to be recovered from the owner by the authority who carried out the works.

²⁴ Section 54 of the Planning (Listed Buildings and Conservation Areas) Act 1990

²⁵ Section 48 of the Planning (Listed Buildings and Conservation Areas) Act 1990

²⁶ Section 47 of the Planning (Listed Buildings and Conservation Areas) Act 1990

²⁷ Section 132 of the Housing Act 2004

²⁸ Section 17 of the Housing Act 1985

²⁹ Law of Property Act 1925

- Historic England runs a grants scheme to help local authorities take statutory action either by underwriting Urgent Works Notices (for Grade I or II* buildings or Grade II buildings in a conservation area) and Repairs Notices or, in extreme cases, assisting in the costs of acquisition.
- The cost of works to make a building habitable through EMDO can be reclaimed from the rent.
- Significant costs associated with compulsory purchase

Key Stakeholders:

- Stroud District Council in, amongst other things, its role as local planning authority and as an owner and manager of several listed assets
- Historic England
- Parish councils (planning matters and asset management)
- Stroud Preservation Trust
- Local civic societies
- Owners and occupiers of listed buildings

What could we do? Opportunities, tools, resources...

SDC Buildings at Risk (BAR) programme

- Establish a database 'Register', which can be easily interrogated and should be routinely updated
- Establish a co-ordinated programme for the management of assets deemed 'at risk', with a view to reducing the number and severity of assets 'at risk' in the District. Including,
 - Liaison, advice and partnership with owners
 - Where necessary, the exercise of statutory powers to intervene (including those set out below)
- A comprehensive photographic record of (all?) buildings in the BAR Register could be undertaken to enable better monitoring and enforcement
- BAR 'Register' should be publicly available via the SDC website: up-to-date Register published annually alongside a status / progress report
- Number of assets 'at risk' to be monitored, to inform the Local Plan monitoring programme (a key indicator for policy ES10)
- Integrate SDC 'BAR' programme and database with Conservation Area reviews, annual CAARS survey, 'Local List', Grade II Condition Survey – to help identify specific buildings at risk and identify priorities for action or intervention (non-designated heritage assets and buildings in conservation areas to be included in 'BAR').
- Community involvement – encourage links to the gathering of evidence for NDPs, parish design statements and other community projects; encourage volunteer participation in Historic England's Grade II Condition survey

Resource implications:

- Server capacity / hardware
- Officer man-hours
- Costs associated with pro-active action and intervention, including urgent works and, ultimately, compulsory purchase

Funding, grants and partnership initiatives for the positive management of listed buildings

- Historic England’s Partnership Schemes in Conservation Areas (PSICA)
<https://historicengland.org.uk/services-skills/grants/our-grant-schemes/partnership-schemes-in-conservation-areas/>
- Heritage Lottery Fund’s Heritage Grants (large projects, grants over £100,000) will fund eligible community-led projects for diverse things including repair, adaptation, heritage interpretation and display, archaeological investigation, traditional skills
<https://www.hlf.org.uk/looking-funding/our-grant-programmes/heritage-grants>
- Heritage Lottery Fund’s Heritage Enterprise grants help fund repair costs for historic buildings where the cost of repair is so high that restoration is not commercially viable. Private and non-for-profit organisations in partnership. Community led. <https://www.hlf.org.uk/looking-funding/our-grant-programmes/heritage-enterprise>

Grade II Condition Survey (Historic England)

- Community involvement – encourage volunteer participation and provide support and expertise where necessary
- Community involvement – encourage links to the gathering of evidence for NDPs, parish design statements and other community projects
- Integrate SDC ‘BAR’ programme and database with Conservation Area reviews, annual CAARS survey, ‘Local List’, Grade II Condition Survey – to help identify specific buildings at risk and identify priorities for action or intervention.
- Photographic record of any buildings surveyed, to populate the BAR database and to enable better monitoring and enforcement

Resource implications:

- Officer man-hours – the engagement and coordination of volunteers/ groups
- Server capacity /hardware

Development management procedures

- SDLP ES10, paragraph 6.57. A “Heritage Statement” – clarify / provide guidance about what this is and when it is required.
- DM consultations: audit of who gets consulted on what and how the triggering criteria is identified. Are there ways that the consultations process could be improved or streamlined? Scope to automate consultations?
- Record and monitor how many enforcement cases are related to breaches of listed building controls annually.
- Record and monitor how many LBC applications are received annually.
- Record and monitor how many planning applications concerning listed buildings are received annually.

References:

http://ihbc.org.uk/recent_papers/docs/Stopping_theRot_accessible.pdf

<https://www.historicengland.org.uk/images-books/publications/stoppingtherot/>

<https://content.historicengland.org.uk/images-books/publications/stoppingtherot/heag046a-stopping-the-rot-summary.pdf/>

<https://historicengland.org.uk/services-skills/grants/our-grant-schemes/grants-to-underwrite-urgent-works/>

<https://historicengland.org.uk/services-skills/grants/our-grant-schemes/acquisition-grants/>

<https://www.historicengland.org.uk/advice/hpg/publicandheritagebodies/>

<https://historicengland.org.uk/advice/caring-for-heritage/heritage-crime/memorandum-of-understanding/>

Consultation Questions:

Stakeholders: *Have we missed any key stakeholders that are currently involved in the management of our District's listed buildings? What role do they play? Are there others who could or should be involved? What benefits might be gained from other private, public or voluntary/charity sector involvement in the management of Stroud's historic parks and gardens?*

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 listed buildings? 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 listed buildings in Stroud District? We would most like to identify issues that are common or widespread. Can you suggest any additional ways of addressing issues, pressures or vulnerabilities that affect these assets in Stroud District?*

Priorities for future action: *what do you think should be prioritised in the Heritage Strategy and Action Plan? Can you envisage any obstacles?*

Conservation Areas

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. Across the country, town and city centres, suburbs, industrial areas, rural landscapes, cemeteries and residential areas have all been designated as conservation areas. They form the historic backcloth to national and local life and are a crucial component of local identity.³⁰

What have we got?

- ★ We have **41** 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 conservation area status: **11,075** addresses lie within a Conservation Area (**7,630** of them are residential).
- ★ **2** of our conservation areas are considered "at risk" according to Historic England's 2016 HAR register: Stroud Industrial Heritage Conservation Area (IHCA) and Stanley Mills Conservation Area
- ★ **15** (37%) of our Conservation Areas have 'Conservation Area Statements' (CAS), which include an appraisal of their character and significance, plus management proposals for their conservation or enhancement. Only one of these documents is less than 5 years old.
- ★ **27** of our Conservation Areas have never been reviewed or appraised.
- ★ **5** of our Conservation Areas have an 'Article 4 Direction' in place, which introduces additional planning controls over specific works which have been identified as likely to erode the area's character or special interest.

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, to impressive industrial heritage at places like Stanley Mills and Stroud Station.

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

³⁰ Historic England's Heritage At Risk Register 2015, page viii

links a series of smaller pre-existing conservation areas, which were also designated in recognition of the valleys' exceptional industrial heritage.

The IHCA is certainly an unusual conservation area, with its own particular issues and pressures. The valley bottoms are subject to some of the most intense development pressures in the District, and yet they are amongst our most constrained slivers of land: as well as visible heritage and hidden archaeology, the IHCA is faced with issues such as flooding and contamination from past industry, tightly packed layers of transport infrastructure (canal, roads, rail, river) and access difficulties. 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 region³¹.

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.

The Council's role

Development management

- As the local planning authority, Stroud District Council is responsible for determining most planning applications for development within or affecting the setting of a conservation area. Although The Town and Country Planning (General Permitted Development) Order 2015 (GPDO) allows certain minor developments to take place without specific consent, this is more restricted in conservation areas.
- The Council also deals with proposals to carry out certain works to trees in conservation areas. Last year (1 April 2015 – 31 March 2016) the Council dealt with 282 applications for works to trees in conservation areas. The local planning authority has powers to make a tree preservation order (TPO) where specific trees are identified of being of particular value to the character and amenity of an area.
- When considering any planning application that affects a conservation area or its setting, a local planning authority **must pay special attention to the desirability of preserving or enhancing the character or appearance of that area**³². (Note: This duty goes beyond just decisions on permissions and applies to the exercise by the local authority of all its other functions under the planning acts, such as compulsory acquisitions, urgent works and grants).
- Applications for planning permission for works affecting the character or appearance of a conservation area must be publicised³³
- Local planning authorities must notify Historic England of applications in conservation areas which involve the erection of a new building or extension to an existing building, where the application's site area is more than 1,000 sqm³⁴

³¹ 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.

³² *Planning (Listed Buildings and Conservation Areas) Act 1990*. Section 72.

³³ *Planning (Listed Buildings and Conservation Areas) Act 1990*. Section 73.

³⁴ Regulation 5A(3) of the *Planning (Listed Buildings and Conservation Areas) (Amendment) (England) Regulations, 2015*

- Any application made *by* the local planning authority involving the demolition of an unlisted building in a conservation area must be notified to Historic England. If Historic England objects and the local authority is still minded to grant permission, the application must be determined instead by the Secretary of State³⁵
- A Design and Access Statement must be submitted to accompany any application for development in a conservation area involving the provision of one or more dwellinghouses or the provision of building(s) which would create 100sqm or more additional floorspace³⁶

Designation and Review

- As the Local Authority, Stroud District Council has the statutory power to designate conservation areas³⁷. All properties within a conservation area are required to have this recorded as a local Land Charge³⁸.
- 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 designation³⁹. We have a duty to designate any areas that are found worthy.
- Ideally, an ‘appraisal’ of the area should be carried out at the time of designation, to explain its special architectural or historic significance⁴⁰.
- The NPPF⁴¹ 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).

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 protection⁴².

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 was 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 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.

³⁵ *Planning (Listed Buildings and Conservation Areas) Act 1990*. Section 74. Regulation 4A of *The Town and Country Planning general (Amendment) (England) Regulations, 2015*

³⁶ *Town and Country Planning (Development Management Procedure) (England) Order, 2015*. Section 9(1).

³⁷ Legislation?

³⁸ Reference???

³⁹ *Planning (Listed Buildings and Conservation Areas) Act 1990*. Section 69.

⁴⁰ Reference???

⁴¹ NPPF, paragraph 141

⁴² PPG *Conserving and enhancing the Historic Environment*, paragraph 025

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.

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 areas⁴³.
- 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 NPPF⁴⁴.
- Local planning authorities may withdraw permitted development rights for a prescribed range of developments that affect the external appearance of buildings in a conservation area by the use of a direction under Article 4 of the GPDO.

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 change⁴⁵.

Traditionally, Stroud District’s Conservation Area Statements have included a section on design guidance and opportunities for enhancement, linked to particular issues and pressures identified for that conservation area. 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.

Local authority powers in conservation areas

Stroud District Council has a range of powers to intervene where listed buildings are subject to damage, neglect or deterioration:

- Urgent Works Notices (S54) can secure emergency or immediate repairs to those buildings or parts of buildings which are unoccupied. If the building is unlisted then agreement of the Secretary of State is required.
- A Repairs Notice (S48) can only be served on a listed building and can secure much more extensive repairs, but the LPA must be prepared to exercise powers of compulsory purchase should the owner not co-operate.

⁴³ Planning (Listed Buildings and Conservation Areas) Act 1990. Section 71.

⁴⁴ NPPF, paragraphs 126 and 157.

⁴⁵ Historic England *Advice Note 1: Conservation Area Designation, Appraisal and Management* (2016), paragraph 22.

- Under its general planning powers an LPA can serve a Section 215 notice (*Town and Country Planning Act 1990*) on the owner or occupier where the building or land is adversely affecting the amenity of the area and can require them to clean up the building or site. Commonly known as a “Tidy-up notice”.
- Local authorities can also exercise Housing powers to carry out repairs and adaptations bring empty buildings in conservation areas back into productive use to provide homes
 - by taking over management control of the property through S.132 “Empty Dwelling Management Orders” (EMDO)⁴⁶
 - by purchasing through S.17⁴⁷ “Acquisition of land for housing purposes”, either through agreement with the owner or by CPO (subject to authorisation by the Secretary of State)
- Enforced Sale procedure⁴⁸ is one of the main tools used to deal with empty homes, but can apply to any vacant property which meets the criteria. Its use can be quicker than CPO as a means of recovering debts incurred by the local authority in exercising statutory actions.
- 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.

Resource implications:

- S.55 allows for the costs of the works required by an Urgent Works Notice to be recovered from the owner by the authority who carried out the works.
- Historic England runs a grants scheme to help local authorities take statutory action either by underwriting Urgent Works Notices (for Grade I or II* buildings or Grade II buildings in a conservation area) and Repairs Notices or, in extreme cases, assisting in the costs of acquisition.
- Significant costs associated with compulsory purchase

⁴⁶ Section 132 of the Housing Act 2004

⁴⁷ Section 17 of the Housing Act 1985

⁴⁸ Law of Property Act 1925

Table: review / appraisal status of conservation areas in Stroud District (December 2016)

Conservation Area		Original designation	Boundary changes?	Last reviewed	Adopted CAS?	Article 4?
1	Wotton Under Edge	August 1972	1988, 1999	1999	November 1999	Yes
2	Amberley	November 1973			No	
3	Box	November 1973			No	
4	Minchinhampton	November 1973			No	
5	Berkeley	February 1973			No	
6	Bisley	November 1975	1997	2006	October 1997, June 2007	Yes
7	Frampton on Severn	November 1975	2008	2007-8	November 2008	Yes
8	Kingswood	November 1975		2014 (review carried out by the local community in liaison with SDC)	December 2014	
9	Alderley	July 1977			No	
10	South Woodchester	September 1977	2008	2006-8: Partial review, together with adjoining IHCA	No	
11	Miserden	October 1977			No	
12	Pitchcombe	November 1977			No	
13	Painswick	December 1977	1990		No	
14	Nymphsfield	January 1978			No	
15	Stinchcombe	January 1978			No	
16	Stroud – Top of the Town	February 1978	2008	2006-8	April 2008	Yes
17	Stroud – The Shambles	February 1978	2008	2006-8: The Shambles and Central were merged to form Stroud Town Centre CA	April 2008	Yes
18	Stroud – Central	September 1982	1991, 2008			
19	Chalford Hill	November 1986			No	
20	Chalford Vale	November 1986	2008	2006-8: Partial review, together with adjoining IHCA	No	
21	Dunkirk & Watledge	November 1986	2008	2006-8: reviewed with adjoining IHCA	IHCA CAS, November 2008	
22	Ebley Mills	November 1986		2006-8: reviewed with adjoining IHCA	IHCA CAS, November 2008	
23	France Lynch	November 1986			No	
24	Lodgemore & Fromehall	November 1986		2006-8: reviewed with adjoining IHCA	IHCA CAS, November 2008	
25	Longfords Mills	November 1986		2006-8: reviewed with adjoining IHCA	IHCA CAS, November 2008	
26	Stanley Mills	November 1986	2008	2006-8: reviewed with adjoining IHCA	IHCA CAS, November 2008	
27	St Mary's & Belvedere	November 1986	2008	2006-8: reviewed with adjoining IHCA	IHCA CAS, November 2008	

Positive management: Conservation Areas

Conservation Area		Original designation	Boundary changes?	Last reviewed	Adopted CAS?	Article 4?
28	Stroud – Station	November 1986	2008	2006-8: reviewed with adjoining IHCA and Stroud Central CA	IHCA CAS, November 2008	
29	Stroud Industrial Heritage (IHCA)	September 1987	Jan/Jun 1989, 1990, 1992, 1992, 2002	2006-8	IHCA CAS, November 2008	
30	Uley	August 1988			No	
31	Nailsworth	March 1989	Sept/Nov 1992, 2008	2006-8: Partial review, together with adjoining IHCA	No	
32	Dursley	November 1989			No	
33	Woodmancote	November 1989			No	
34	Stroud – Stratford Park	March 1990		2007-8	April 2008	
35	Gyde House	June 1990			No	
36	Randwick	June 1990			No	
37	Sharpness Old Dock	October 1990			No	
38	Eastcombe	January 1991			No	
39	Saul	January 1991			No	
40	Bussage & Brownhill	September 1991			No	
41	Sheepscombe	March 1993			No	
42	Arlingham	June 1993			No	

Stakeholders

Historic England

- Consulted on planning applications in conservation areas which involve the erection of a new building or extension to an existing building, where the application's site area is more than 1,000 sqm⁴⁹. May offer discretionary advice on other significant developments in conservation areas, if sought.
- Conservation Areas At Risk Survey (CAARS): Historic England has asked every local authority in England to complete (and update as appropriate) a survey of its conservation areas, highlighting current condition, threats and trends. Conservation areas that are deteriorating, or are in very bad or poor condition and not expected to change significantly in the next three years, are defined as being at risk. The information provides a detailed assessment of each conservation area. An overall category for condition, vulnerability and trend is included for each conservation area on this Register. Conservation areas are removed from the Register once plans have been put in place to address the issues that led to the conservation area being at risk, and once positive progress is being made.
- SW regional office has a remit to provide advice on understanding and enhancing the heritage significance of local places through local plans, masterplans and neighbourhood plans, and to provide training and support for people involved in the management of the historic environment

Town and Parish Councils

- Commenting on planning applications
- Conservation Area Appraisals
- Neighbourhood Development Plans
- Community / Parish Design Statements

Community involvement

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.

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.

What could we do? Opportunities, tools, resources...

Conservation area review programme

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-

⁴⁹ Regulation 5A(3) of the *Planning (Listed Buildings and Conservation Areas) (Amendment) (England) Regulations, 2015*

to-date Conservation Area Statement (CAS), consisting of character appraisal and management proposals, in place for each conservation area.

Next steps could include:

- Set out a reasonable and realistic work programme in the Heritage Action Plan, which should be reviewed periodically and updated alongside the Action Plan, to reflect changing vulnerabilities or the urgency of each conservation area's need.
- The number of conservation areas with an up-to-date CAS (including character appraisal and management proposals) should be monitored annually, to inform the monitoring of key indicators for the Local Plan (policy ES10)
- Use the annual Conservation Areas At Risk Survey (CAARS) to help identify which conservation areas have the most urgent need for character appraisal to help guide development proposals and / or management proposals to address particular issues and pressures
- Give priority to the review of "at risk" conservation areas (and the most vulnerable, as identified through CAARS); and to areas subject to Local Plan allocations; conservation areas in town centres and 'upper tier' settlements; and areas with emerging NDPs / Parish Design Statements
- Community involvement – links to NDPs and Parish Design Statements: encourage communities to undertake conservation area appraisal, in liaison with SDC officers, as part of their evidence base
- Prioritise the completion of the Industrial Heritage Conservation Area Statement, namely part 2 of the character appraisal: the "Character Parts". To enable more focussed and site-specific use of the IHCA CAS, Management Proposals SPD and Design Guide SPA.
- Undertake a regular review of all existing CAS to ensure they are still fit for purpose – ideally every five years
- Undertake a comprehensive photographic record of (all?) buildings in a conservation area when it is subject to Review, alongside production of a CAS – to enable better monitoring and enforcement
- Integrate with the SDC 'Buildings At Risk' database and monitoring / action programme – to help identify specific buildings at risk and identify priorities for action or intervention (non-designated heritage assets and buildings in conservation areas to be included in 'BAR').
- Incorporate a survey to identify non-designated assets worthy of inclusion in a 'Local List' into every conservation area review, to be adopted into the list alongside the Conservation Area Statement
- Reference sources including SALA, Brownfield Register, SDC owned assets, to help identify sites or buildings where positive enhancement opportunities might exist.
- Grade II listed building condition survey
- The review programme should include assessment of whether existing designations are still justified, as well as identifying whether any additional areas are worthy of designation

Resource implications:

- Server capacity / hardware
- Officer man-hours

Article 4 directions

- 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.
- 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.
- Public awareness: mail shot all designated properties?
- Review all current Article 4 properties, to ensure the designation is still warranted
- Carefully considered new Article 4 designations should be made when each CA is reviewed and adopted alongside the CAS.
- Monitoring data: how many Article 4 planning applications are dealt with annually?
- Produce and advice leaflet and / or design guidance which specifically concerns works that are controlled through Article 4 directions: explain what the issue / 'harm' can be, why the controls are in place and suggestions for what an acceptable solution might be. (Article 4 directions are about *control* rather than prohibition).

Resource implications:

- Server capacity / hardware
- Officer man-hours
- Costs of administering planning applications resulting from the Article 4 direction

Design quality and guidance

- Local planning authorities may set up conservation area advisory committees which should consist mostly of non-local authority people who represent the interests of residents and businesses and who are able to bring expertise or understanding of the area's history and amenity. <https://www.historicengland.org.uk/advice/hpg/has/conservation-areas/>
- Within Gloucestershire, the Gloucestershire Design Panel has been established as a local review panel to consider locally significant proposals. Prior to the establishment of the panel, not all local authorities in Gloucestershire had access to local design review. <http://www.glosdesignpanel.co.uk/what-we-do>
- 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)
- 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

- Training and awareness: mini-briefing sessions for decision makers (DM officers, DC Committee, PSAP) to flag up main vulnerabilities in conservation areas, main intentions of management proposals, interpretation of design guidance and how to access / use / refer to the available documents
- Produce an advice leaflet and / or design guidance which specifically concerns works that are controlled through Article 4 directions: explain what the issue / 'harm' can be, why the controls are in place, and *suggestions* for what an acceptable solution might be. (Article 4 directions are about *control* rather than prohibition).
 - Including: windows and doors; renewable/microgeneration/solar; porous hard surfacing; porches; cladding, painting; gates, fences, walls, enclosure; dormers)
- Establish a 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.
- 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.
- Affordable housing: help schemes to complement and enhance the historic character of our market towns and villages; investigate potential adaptive re-use of historic buildings to provide (affordable) housing (including SDC's own house-building programme)
- Strategic site allocations and 'regeneration' sites (in particular Sharpness Old Dock CA and IHCA)

Resource implications:

- Server capacity / hardware
- Officer man-hours

CAARS survey / Conservation Areas "at risk"

- Commit to undertaking CAARS survey annually (survey open approx April – July each year)
- Community involvement? E.g. an annual pre-survey (Feb/March?) questionnaire /letter /email to parish councils, asking for specific info / new issues
- Use the annual CAARS findings to inform and update the CAS / Review programme of works (order of priority)
- Integrate with SDC 'BAR' database and monitoring / action programme – to help identify specific buildings at risk and identify priorities for action or intervention (non-designated heritage assets and buildings in conservation areas to be included in 'BAR').
- Special advice and involvement from Historic England for CAs at risk: IHCA and Stanley Mills. The South West regional team has a specific focus on reducing local heritage at risk. They use the outcomes of research and the annual HAR Register to help priorities where they spend their time and funding – e.g.
 - Education and training
 - Facilitation: mediation and introductions to help bring about positive development outcomes and secure new futures

- Grant aid?? Kick-start? Working with partners, including HLF, to support owners in funding repair/conservation works and also studies to understand what works are needed
- Advice and involvement in major schemes, including masterplanning and development briefs
- Number of conservation areas with an up-to-date 'risk survey' (i.e. CAARS assessment) to be monitored annually, to inform the monitoring of key indicators for the Local Plan (policy ES10)

Resource implications:

- Officer man-hours

Funding, grants and partnership initiatives for the positive management of conservation areas

- Historic England's Partnership Schemes in Conservation Areas (PSICA) <https://historicengland.org.uk/services-skills/grants/our-grant-schemes/partnership-schemes-in-conservation-areas/>
- Heritage Lottery Fund's Townscape Heritage Initiative (THI) <https://www.hlf.org.uk/looking-funding/our-grant-programmes/townscape-heritage>
- Historic England Heritage Action Zone (current round of applications now closed – this could be a longer term project ...IHCA??) <https://www.historicengland.org.uk/services-skills/heritage-action-zones/breathe-new-life-into-old-places-through-heritage-action-zones/>

Development Management (planning) procedures; public awareness; education and training for decision-makers

- Build awareness of the existence of adopted CAS – how they should be referred to and what weight they should be accorded
- Add conservation areas with an adopted CAS appear to the planning constraints maps (both public / online interface and DM system / Uniform / Hub mapping; and that they are automatically flagged up as constraints
- Raise awareness and understanding of the main issues and vulnerabilities, including incremental harm, to build decision-makers' confidence about determining applications and offering pre-application advice on what may or may not be acceptable in particular conservation areas
- Record and monitor how many planning applications within conservation areas are received annually.
- 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.

References:

- <http://www.buildingconservation.com/articles/conservareas09/conservareas09.htm#2>
- <https://www.historicengland.org.uk/advice/hpg/historic-environment/article4directions/>
- <https://historicengland.org.uk/services-skills/grants/our-grant-schemes/partnership-schemes-in-conservation-areas/>
- <https://www.historicengland.org.uk/advice/planning/historic-towns-and-high-streets/>

<https://historicengland.org.uk/advice/planning/housing/affordable-rural-housing/>

Consultation Questions:

Stakeholders: *Have we missed any key stakeholders that are currently involved in the management of our District's conservation areas? What role do they play? Are there others who could or should be involved? What benefits might be gained from other private, public or voluntary/charity sector involvement in the management of Stroud's conservation areas?*

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. Can you suggest any additional ways of addressing issues, pressures or vulnerabilities that affect these assets in Stroud District?*

Priorities for future action: *what do you think should be prioritised in the Heritage Strategy and Action Plan? Can you envisage any obstacles?*

Scheduled Monuments and other nationally important or locally identified archaeology

*England is renowned for the richness and depth of its archaeological heritage: a tangible – and often highly evocative – link with our prehistoric and historic past, and a unique source of information, which has the potential to transform our knowledge and understanding of the lives of our ancestors and how they adapted to and influenced their changing environment.*⁵⁰

Whether they form significant features in our surroundings, or are tucked away out of sight, archaeological remains have intrinsic value. They are valuable as a resource for research and education and potentially for leisure, tourism and regeneration; they are valuable for their influence on perceptions of identity and spirit of place. However, they are also a finite, irreplaceable and fragile resource and are vulnerable to a wide range of human activities and natural processes.

Scheduled Monuments

The United Kingdom has had legislation in place to help safeguard the future of its cultural heritage since the passing of the Ancient Monuments Protection Act 1882. In England the current legislation is the Ancient Monuments and Archaeological Areas Act 1979, which requires the Secretary of State to compile and maintain a schedule of nationally important archaeological sites, known as “Scheduled Monuments” (or sometimes “Scheduled Ancient Monuments” or “SAMs”).

The intention of Scheduling is to protect this carefully selected sample of the nation’s archaeology so that it can be handed on to the future in much the same state as when it was Scheduled – so to protect and manage, rather than to ‘restore’. Some sites require little or no intervention; some require careful management with the involvement of Historic England. To help protect them from uncontrolled change or unauthorised geophysical surveys, **Scheduled Monument Consent (SMC) or a Section 42 licence is required for most works and interventions**. It is a criminal offence to demolish, destroy, damage, remove, repair, alter or add to a Scheduled Monument, or to undertake flooding or tipping operations on land in, on or under which there is a Scheduled Monument, unless prior consent has been obtained. In practice, Scheduled sites are selected on the advice of Historic England, who also administer applications for Scheduled Monument Consent (SMC) on behalf of the Secretary of State for Culture Media and Sport (DCMS). **Development close to a scheduled monument which might damage its setting is also a material consideration** in the planning system.

Non-designated archaeology

Stroud District, like much of the rest of the country, is also rich in non-designated archaeology. This includes archaeology that is of less than national significance, and also archaeology which is yet to be discovered.

⁵⁰ DCMS: *Scheduled Monuments and nationally important but non-scheduled monuments*, October 2013.

Non-scheduled archaeology is **not subject to the same Consent regime as Scheduled Monuments**. However, the National Planning Policy Framework (NPPF)⁵¹ expects that *nationally important* but non-scheduled monuments will be protected through the planning system: essentially, such archaeological sites should be treated the same as Scheduled Monuments⁵² when considering any proposed development which would affect the site or its setting. The impact of development on the significance of monuments of lesser or “local” importance is **also a consideration in the planning process**⁵³. Decision-taking regarding such assets requires a proportionate response by local planning authorities.

Planning Practice Guidance advises that where an initial assessment indicates that the site on which development is proposed includes or has potential to include heritage assets with archaeological interest, applicants should be required to submit an appropriate desk-based assessment and, where necessary, a field evaluation⁵⁴.

Where an asset is thought to have archaeological interest, the potential knowledge which may be unlocked by investigation may be harmed even by minor disturbance, because the context in which archaeological evidence is found is crucial to furthering understanding.

What have we got?

- ★ **68** Scheduled Monuments (almost 1% of all the Scheduled Monuments in the South West)
- ★ **5** (7.4%) of the District’s Scheduled Monuments are considered to be “at risk” according to Historic England⁵⁵ (compared to 13.6% across all of England and 16.6% across the South West).
- ★ **33** barrows: almost half of Stroud District’s Scheduled Monuments consist partly or entirely of long- round- or bowl-barrows, which are ancient burial mounds. Four of the five Scheduled Monuments on Historic England’s 2016 Heritage at Risk register are barrows. Barrows are typically at particular risk from ploughing, agriculture and animal burrowing.

Stroud is moderately well endowed with Scheduled archaeology. Many other English local authorities (particularly in the South West, North East and Welsh borders) have far greater numbers of Scheduled Monuments, including the vast unitary authorities of Wiltshire and Cornwall (both 1,300+). But most English local authorities have fewer than 60. 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.

33 of our 68 Scheduled Monuments consist partly or entirely of long- round- or bowl-barrows, which are ancient burial mounds. 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

⁵¹ NPPF paragraph 139

⁵² DCMS: *Scheduled Monuments and nationally important but non-scheduled monuments*, October 2013. Paragraph 11

⁵³ NPPG paragraph 040

⁵⁴ NPPG paragraph 040

⁵⁵ Historic England’s Heritage at Risk Register 2016

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.

Stroud District's Roman heritage is another notable source of archaeology. 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 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.

Several archaeological discoveries in the Frome valley and on the Severn Vale indicate that pre-medieval activity and settlement may have been more extensive and significant in this part of the District than previously assumed. These may be areas of significant archaeological potential.

A wealth of archaeological evidence has emerged since the 1990s as a result of developer-funded archaeology. Discoveries in areas subject to new development are reshaping our picture of the District in ancient times, and prehistoric life in particular.

Particular risk factors for our archaeological sites include intensive farming, high visitor numbers causing erosion, burrowing animals, scrub and tree growth and general neglect.

The Council's role

The District Council is not empowered to 'Schedule' archaeological remains. But, like anyone else, we can put the case to Historic England and ask the Secretary of State to consider adding an asset to the Schedule. The Secretary of State, rather than the District Council, is also the determining authority when an application for Scheduled Monument Consent is made (applications for SMC must be made direct to Historic England).

But the Council has a range of other powers, duties and obligations associated with both Scheduled Monuments and non-designated archaeology:

- Required to pay special attention... in the consideration... (material consideration)
- Development close to a scheduled monument which might damage its setting is also a material consideration in the planning system [wiki!]
- Advised to seek information about the significance... (NPPF) ...in connection with proposed development
- Required (?) to consult with GCC (?) / seek specialist advice
- Identification of non-designated assets or archaeological potential: relies on officer knowledge and judgement about areas of potential (no established protocol or automation)

- Standard conditions for planning applications where development might affect archaeology
- Role of the HER?
- The local planning authority is **required to notify Historic England** when dealing with any application for development which it is likely to affect the site of a scheduled monument⁵⁶

Core Policy ES10 of the Stroud District Local Plan requires applicants to describe the significance of any heritage asset affected by a development proposal (including an assessment of whether and how the asset's setting contributes to this significance) in a 'heritage statement', to accompany the planning application. This requirement accords with national advice in the NPPF and Planning Practice Guidance and it enables the planning authority to properly assess the likely impact of the proposed development. It applies to both Scheduled Monuments and non-designated archaeology⁵⁷.

Stakeholders

Historic England

In practice, Scheduled sites are selected on the advice of Historic England, who also administer applications for Scheduled Monument Consent (SMC) on behalf of the Secretary of State for Culture Media and Sport (DCMS).

Historic England has nine local teams, each of which has a specific focus on reducing local heritage at risk. They use the outcomes of research and the annual 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 understand what repair or conservation works are needed as well as the actual work.

Gloucestershire County Council

Gloucestershire County Council (GCC) hosts the Historic Environment Record (HER) for Gloucestershire and acts as specialist advisor to each of the county's planning authorities, including Stroud District.

Gloucestershire's HER (www.gloucestershire.gov.uk/her) holds over 42,000 computerised records of archaeological sites, historic buildings and other notable sites of historic interest, both designated and undesignated. Public access to this information is encouraged and the service offers a data search to identify known and potential archaeology in and around any given site.

The County Council's archaeology service can also carry out pre-application assessments for anyone preparing to make a planning application, to identify the archaeological implications of the proposed development. They will advise whether the proposed development might warrant commissioning a desk-based archaeological assessment or field evaluation (a survey or sample excavation on the site). This information will help the District Council's planning authority determine the implications, if any, of the proposed development, in accordance with Local Plan policy ES10 and the NPPF.

⁵⁶ Schedule 4(r) of the *Town and Country Planning (Development Management Procedure) (England) Order*, 2015.

⁵⁷ NPPG paragraph 040

The service can also advise land owners, parish councils, volunteer organisations and community groups about how best to manage archaeological sites and the historic landscape, including: how to manage archaeological sites or historic structures including survey, erosion repair and vegetation control; tree planting and managing woodland, how to avoid sensitive archaeological sites that may be unsuitable for planting; archaeology in relation to current agri-environment schemes.

Commercial archaeology

A lot has happened to the region's archaeology in the last twenty-five years, a wealth of evidence which has emerged since the 1990s as a result of developer-funded archaeology.

What could we do? Opportunities, tools, resources...

- The identification of undesignated archaeology of local significance should be included in a programme for creating a Local Heritage List
- Local heritage assets, including undesignated archaeology, could be added to the planning constraints maps (both the public online interface and the local planning authority's internal system)
-

You can download historic England's [Scheduled Monuments: A Guide for Owners and Occupiers](#) 2013 guide for further information on scheduled monuments.

Consultation Questions:

Stakeholders: *Have we missed any key stakeholders that are currently involved in the management of our District's archaeology? What role do they play? Are there others who could or should be involved? What benefits might be gained from other private, public or voluntary/charity sector involvement in the management of Stroud's archaeological sites and scheduled monuments?*

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 archaeological sites? 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 archaeology and scheduled monuments in Stroud District? We would most like to identify issues that are common or widespread. Can you suggest any additional ways of addressing issues, pressures or vulnerabilities that affect these assets in Stroud District?*

Priorities for future action: *what do you think should be prioritised in the Heritage Strategy and Action Plan? Can you envisage any obstacles?*

Historic parks, gardens and designed landscapes

The national “Register of Historic Parks and Gardens of Special Historic Interest in England” was established in 1983 and is maintained by Historic England. The main purpose of this Register is to celebrate nationally notable designed landscapes, raise awareness about their value and encourage appropriate protection and care for them.

Inclusion on the Register does not itself bestow any statutory controls (there are no statutory limitations on what can or cannot be done) and **there is no separate consent system for them**, unlike for Listed Buildings or Scheduled Monuments. But **their significance is a "material consideration" in the planning process**⁵⁸, meaning that planning authorities must take account of the impact of any proposed development on registered landscapes’ special character when considering any proposed development affecting these sites or their settings.

‘Non-designated heritage assets’

As ‘designated heritage assets’, registered parks and gardens have a high status within the planning system. However, registration is not the only way in which parks and gardens may be recognised. NPPF policy also applies to ‘non-designated heritage assets’. These can be identified in a local plan or a local list (initiated either by the local planning authority or via a neighbourhood development plan), or through the process of considering a planning application.

The Register continues to be developed and designed landscapes added, so the identification and careful consideration of non-designated sites as ‘local heritage assets’ is all the more important. Local lists identify heritage assets which are valued by the local community as distinctive elements of the local historic environment, and may certainly include parks and gardens. The inclusion of parks and gardens in a local list raises their profile and also brings the benefits of national and local planning policy.⁵⁹

What have we got?

- ★ **14** Registered Parks and Gardens solely within the District
- ★ Plus part of Newark Park, which straddles the border with Cotswold District

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.

⁵⁸ Legislation? NPPF?

⁵⁹ *The Planning System in England and the Protection of Historic Parks and Gardens – Guidance for Local Planning Authorities*. The Gardens Trust

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 Miserden Park to England’s only 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.

Alderley Grange	Grade II
Alderley, The Mount House	Grade II
Berkeley Castle	Grade II*
Bradley Court	Grade II
Frampton Court	Grade II*
Gatcombe Park	Grade II
Lypiatt Park	Grade II*
Miserden Park	Grade II*
Nether Lypiatt Manor	Grade II
Newark Park (partly in Cotswold District)	Grade II
Owlpen Manor	Grade II
Painswick House (Rococo Garden)	Grade II*
St Mary’s Churchyard, Painswick	Grade II
Stancombe Park	Grade I
Woodchester Mansion	Grade II

The Council’s role

Registration is a 'material consideration' in the planning process, meaning that planning authorities must consider the impact of any proposed development on the landscapes' special character.

As the Local Planning Authority, Stroud District Council must consult The Gardens Trust (formerly the Garden History Society) whenever we consider a planning application which affects a registered park or garden. We must also consult Historic England if the park or garden is registered either Grade I or II*.⁶⁰ In practice, this is a rare occurrence within Stroud District. The consultation requirement is triggered by any development proposal which affects the registered site; this may be at some distance, and have no physical connection with the registered site. Each application should therefore be considered carefully for its potential impact on designed views into, as well as from, the landscape and setting.

Stakeholders

The Gardens Trust

The Gardens Trust (formerly the Garden History Society) is the statutory consultee for parks and gardens. The organisation plays a key conservation role and supports the County Gardens Trusts in the protection and conservation of designed landscapes.

The County Gardens Trust

Gloucestershire Gardens and Landscape Trust is a registered charity, founded in 1991 to identify, record and preserve the county’s gardens and landscapes. Through its research and through

⁶⁰ Schedule 4(s) of the *Town and Country Planning (Development Management Procedure) (England) Order, 2015*.

cooperation with owners and conservation bodies, the Trust seeks to help protect and raise awareness about significant sites. Across Gloucestershire, GGLT has documented several hundred designed landscapes of regional or local importance, in addition to the designated sites on the national Register. The Trust is an important source of information about local heritage assets, whose involvement in developing a Local Heritage List for the District would be invaluable.

What could we do? Opportunities, tools, resources...

Local Heritage Assets

- The Council should identify undesignated designed landscapes, parks and gardens of local significance for inclusion in a Local Heritage List
- Work with the County Gardens Trust to identify potential candidates
- Engage with local communities to identify sites of local value and significance
- Integrate with conservation area review programme to help identify significant sites which contribute to the character or appearance of the conservation area

Green infrastructure

- The emerging Green Infrastructure Strategy (supplementary planning advice) offers opportunities to help identify sites, and to highlight their potential recreational, amenity and biodiversity value

Development Management procedures

- Ensure parks and gardens appear on the planning constraints maps.
- Review whether the flagging-up of these sites as a planning constraint can be automated
- Review whether the notification to the Gardens Trust can be automated
- Record and monitor how many enforcement cases concern registered parks or gardens.
- Record and monitor how many planning applications concerning registered parks or gardens are received annually.

Consultation Questions:

Stakeholders: *Have we missed any key stakeholders that are currently involved in the management of our District's historic parks, gardens and designed landscapes? What role do they play? Are there others who could or should be involved? What benefits might be gained from other private, public or voluntary/charity sector involvement in the management of Stroud's historic parks and gardens?*

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 historic parks, gardens and designed landscapes? 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 historic parks, gardens and designed landscapes in Stroud District? We would most like to identify issues that are common or widespread. Can you suggest any additional ways of addressing issues, pressures or vulnerabilities that affect these assets in Stroud District?*

Priorities for future action: *what do you think should be prioritised in the Heritage Strategy and Action Plan? Can you envisage any obstacles?*

Museums and cultural heritage assets

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.

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.

Consultation Questions:

Stakeholders: *who are the key stakeholders that are currently involved in the management of our District's museums, archives and cultural heritage assets? What role do they play? Are there others who could or should be involved?*

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 cultural heritage? 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 these assets in Stroud District? We would most like to identify issues that are common or widespread. Can you suggest any additional ways of addressing issues, pressures or vulnerabilities that affect these assets in Stroud District?*

Priorities for future action: *what do you think should be prioritised in the Heritage Strategy and Action Plan? Can you envisage any obstacles?*

Our local distinctiveness: design and development

Over the past few 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.

This is self-perpetuating: 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 about a place.

This does not mean that all development has to directly mimic traditional buildings in every respect, although this is a perfectly valid design approach. It is 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.

The Council should be to 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.

What could we do? Opportunities, tools, resources...

Design quality and guidance

- Review the SDC web pages, to ensure that design guidance is clearly signposted and easily accessible from all relevant pages. Consider how the website might be used to raise the profile of design as an issue, highlighting SDC’s expectations of high design standards.
- Review, refresh and rationalise Stroud District Council’s various supplementary planning advice documents:
 - Residential Design Guide SPG (2000)
 - Householder Design Guide SPA (2007)
 - Shopfronts Design Guide (2011)
 - Industrial Heritage Design Guide SPA (2008)
 - (emerging) Sustainable Construction Checklist SPD
- Training and awareness: mini-briefing sessions for decision makers (DM officers, DC Committee, PSAP) to flag up main vulnerabilities in conservation areas, main intentions of management proposals, interpretation of design guidance and how to access / use / refer to the available documents
- Conservation Areas Advisory Panel or a Design Review Panel
- Design awards scheme

- Audit / review of permissions granted in conservation areas – appraise positive and negative outcomes, issues, lessons to be learned

Article 4 directions

- Public awareness: mail shot all designated properties?
- Review all current Article 4 properties, to ensure the designation is still warranted
- Comprehensive photographic record of all Article 4 buildings, to enable monitoring and enforcement
- Carefully considered new designations should be made when each CA is reviewed and adopted alongside the CAS.
- Monitoring data: how many Article 4 planning applications are dealt with annually?
- Produce an advice leaflet and / or design guidance which specifically concerns works that are controlled through Article 4 directions: explain what the issue / 'harm' can be, why the controls are in place, and *suggestions* for what an acceptable solution might be. (Article 4 directions are about *control* rather than prohibition). Including: windows and doors; renewable/microgeneration/solar; porous hard surfacing; porches; cladding, painting; gates, fences, walls, enclosure; dormers)

Resource implications:

- Server capacity / hardware
- Officer man-hours
- Costs of administering planning applications resulting from the Article 4 direction

