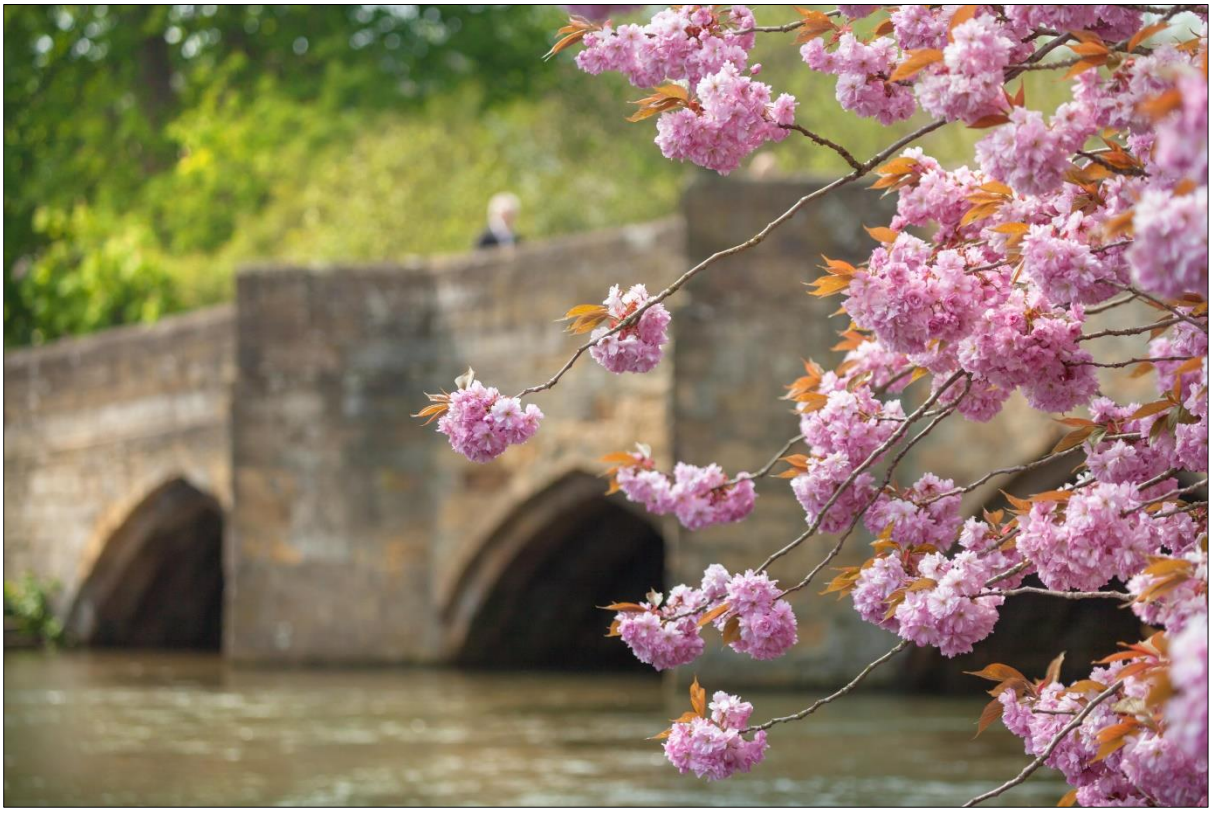
Local Plan Review Topic Paper

Heritage and Built Conservation



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Introduction

This topic paper has been prepared to inform the review of the Peak District National Park Local Plan. Its focus is heritage and built conservation.

Its purpose is to:

- assess the performance of existing policy
- examine the latest research, guidance and evidence that will impact on new policy
- highlight gaps in knowledge and generate areas of further research

Other topic papers in this series cover:

- Climate Change and Sustainable Buildings
- Economy
- Health and Well-being
- Housing
- Landscape, biodiversity and nature recovery.
- Minerals (pending)
- Recreation and Tourism
- Shops and Community Facilities
- Spatial Strategy
- Sustainable Transport and Infrastructure
- Utilities

‘Heritage asset’ is the term used to describe a building, monument, site, place, area or landscape that has heritage significance.

Executive Summary

'Our cultural heritage shapes places [and] landscapes….. Our cultural heritage is a fundamental component of our environment – which is far from static. It also reflects the natural qualities of these places. Their geography, climate and geology have all influenced settlement patterns, industrial processes, building design and materials and subsistence activities'

(Heritage Counts 2020: Heritage and the Environment).

The Peak District National Park's (PDNP) cultural heritage is hugely significant in its scale and quality: landscapes that tell a story of thousands of years of people, farming and industry, and characteristic settlements with strong communities and traditions. Planning policies seek to protect valued historic character, manage and enhance cultural heritage and conserve and enhance conservation areas.

Only 5% of PDNP's cultural heritage assets are designated. This means that 95% of assets are 'non-designated' and have no statutory protection.[1]

Annual monitoring of planning policy focuses on decisions that are 'contrary to policy' or that raise 'significant policy issues'. This highlights the balance that planning policy and decision-making seeks to achieve between the impact of a development on the wider landscape and on a building's significance, and the need to address a housing need or ensure a building's conservation.

There are a few applications each year that are cause for concern, but overall it can be concluded that heritage and built conservation policies are performing well.

A new Supplementary Planning Document '*Conversion of Historic Buildings'* will provide further guidance to ensure heritage assets are converted sensitivity and that 'significance' is considered 'up-front' in the planning process through a heritage statement.

New planning policy needs to take into account: a building's carbon life-cycle; the retrofitting of heritage assets sensitively and sustainably in response to climate change and the UK's 2050 zero net carbon target; and the process for determining the curtilage of a heritage asset.

[1] Cultural Heritage in the PDNP · State of the Park

Part 1: Context

1.1 National Park Context

1.1.1 The Peak District National Park was the first national park to be designated under the National Parks and Access to Countryside Act (1949)[2] in 1952. The Environment Act (1995)[3] sets out our purposes and duty in managing the national park:

- to conserve and enhance the natural beauty, wildlife and **cultural heritage** of the national parks; and
- to promote opportunities for the understanding and enjoyment of the special qualities [of the parks] by the public.

1.1.2 In pursuing these purposes, there is also a duty on National Park Authorities to seek to foster the economic and social well-being of our local communities. Where there is conflict between the purposes, the first purpose will take precedent. The importance of conserving and enhancing cultural heritage is of paramount importance to the management of the national park.

1.1.3 A heritage asset can be a building, monument, site, place, area or landscape that has heritage significance.

Designated Cultural Heritage Assets

1.1.4 The Peak District National Park Management Plan Cultural Heritage background paper[4] sets out the importance of cultural heritage in our landscape and in our lives. The paper reports on the number of listed heritage assets the national park:

- 5% of the heritage assets are listed and 95% are non-designated heritage assets.
- In 2019 there were 37 Grade I and 97 Grade II* and 2009 Grade II buildings/structures in the National Park. This equates to almost 3000 individual buildings and structures (sometimes several are covered by a single listing).
- In 2015, the total number of Listed Buildings was 2157, 14 buildings had been de-listed.
- In 2014/15, there were over 400 Listed Building enforcement enquiries. This reduced slightly to 389 cases in early 2020.

1.1.5 There are 473 Scheduled Ancient Monuments in the national park.

1.1.6 There are four Registered Historic Parks and Gardens. These are Chatsworth Park, Haddon Hall, Lyme Park and Thornbridge Hall. None are considered to be at risk.

[2] https://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97
[3] https://www.legislation.gov.uk/ukpga/1995/25/contents
[4] https://www.peakdistrict.gov.uk/__data/assets/pdf_file/0032/78179/Background-Topic-Papers.pdf

1.1.7 There are 109 Conservation Areas, of which 19 have an up-to-date Conservation Area Appraisal, 80 have Conservation Area Appraisal that requires reviewing, and 6 do not have a Conservation Area Appraisal.

1.1.8 There are 14,599 Sites of archaeological interest (monuments) held on our internal historic environment register, not including thousands of features that have been recorded by archaeological surveys that cover around 60% of the national park.

National Policy and Guidance
The English National Parks and the Broads, UK Government Vision and Circular (Defra, March 2010) [5]

1.1.9 Sets out the vision, statutory requirements and policy guidance for national parks to 2030. Specifically, it states 'Cultural heritage and landscape are fundamental to quality of place and, as they are central to attractiveness, distinctiveness, diversity and quality of place in the Parks, should be protected and enhanced'.[6]

8 Point Plan for England's National Parks (2016)[7]

1.1.10 The Government's 8 Point Plan for England's National Parks (2016) sets out their commitment to enhancing people's involvement in the interpretation of the historic environment and natural beauty in National Parks. It states that it will work with National Park Authorities (NPA) to 'tell the story' of their cultural landscapes and improve public appreciation. It refers specifically to 'hands on' experiences for people with the historic environment within national parks through volunteering, getting involved in heritage at risk projects and encouraging the younger generation in archaeology. National Park Authorities are required to regularly review the work that is being undertaken to ensure that they are providing the best offer to experience heritage in the national park.

Joint Statement on the Historic Environment (2015)[8]

1.1.11 The Joint Statement on the Historic Environment in the National Parks of England, Scotland and Wales (2015) is an accord between national parks and historic environment agencies. It focuses on working together 'to further the sustainable management, public understanding, access to, and enjoyment of the cultural heritage of National Parks, by all appropriate means.' This includes sharing research, information, data, best practice, and widening

[5] Para.49. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf
[6] Para.49. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf
[7] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/509916/national-parks-8-point-plan-for-england-2016-to-2020.pdf
[8] https://historicengland.org.uk/content/docs/caring-for-heritage/poster-joint-statement-historic-environment-national-parks-2105-pdf/

officer knowledge to further enhance public understanding and sustainable management of the historic environment.

The Planning (Listed Buildings and Conservation Areas) Act 1990[9]

1.1.12 The Planning (Listed Buildings and Conservation Areas) Act (1990), is the legislation that governs applications for listed building consent. Sec 16 states that 'In considering whether to grant listed building consent for any works the local planning authority….shall 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…..Any listed building consent shall (except in so far as it otherwise provides) ensure for the benefit of the building and of all persons for the time being interested in it.'

1.1.13 Planning consent for a listed building is dealt with under Section 66 of the Act and states that the local planning authority 'shall 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.' Section 72 of the Act refers to planning consent for development within a Conservation Area, stating that local planning authorities shall pay special attention 'to the desirability of preserving or enhancing the character or appearance of that area'.

The Culture White Paper (2016)[10]

1.1.14 The Culture White Paper (2016) sets out the government's commitment to improving our cultural experiences. It acknowledges that 'culture is strongly rooted at a local level; it draws on and reflects the rich diversity of our communities' (Culture While Paper p.30). It goes on to state that 'Each one of our communities has been shaped by a unique combination of landscapes and architecture, traditions and festivals, artisans and artists. We want more local leaders to grasp the potential of culture to achieve their vision for their community, and to put culture at the forefront of their strategies.' (Culture While Paper p.30).

1.1.15 Cultural heritage is considered to play a major role in building strong and healthy communities. Priorities for the government are for an improved digital infrastructure for communities to connect within and with each other, and supporting communities to make best use of their historic assets to support economic growth through regeneration, employment growth and opportunities.

English Churches and Cathedrals Sustainability Review (2016)[11]

1.1.16 The English Churches and Cathedrals Sustainability Review (2016) reflects nationally, 'Over 2000 churches have congregations of fewer than 10 and 2/3rds of church buildings and 75% of grade I listed churches are in rural areas where only 20% of the population lives'.

[9] https://www.legislation.gov.uk/ukpga/1990/9/contents
[10] https://www.gov.uk/government/publications/culture-white-paper
[11] https://www.gov.uk/government/consultations/english-churches-and-cathedrals-sustainability-review

1.1.17 Many churches are the focal point of a village. Whilst they still hold significant amenity and historic value, there has been a decline in their usage. Opportunities to explore their adaptation to meet local community's needs, whilst still providing for a religious community should be explored to ensure their continued use, preventing the risk of falling into disrepair and loss.

1.2 National Planning Policy Framework

1.2.1 The National Planning Policy Framework (2019)[12] (NPPF) states in para 172 that the 'conservation and enhancement of wildlife and cultural heritage…… should be given great weight in National Parks and the Broads.' recognizing that national parks have the highest level of protection in planning policy.

1.2.2 Chapter 16 of the NPPF, 'Conservation and Enhancement of the Historic Environment' clearly sets out the importance of heritage assets as a positive contributing factor to quality of life. It notes that heritage assets are an irreplaceable resource that 'should be conserved in a manner appropriate to their significance…' (NPPF para.184) and that plans should have a positive strategy to conserve and enhance these assets and their settings (NPPF para 185). In particular, local authority plans should take account of:

> a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
>
> b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
>
> c) the desirability of new development making a positive contribution to local character and distinctiveness
>
> d) opportunities to draw on the contribution made by the historic environment to the character of a place
>
> (NPPF para 192)

1.2.3 To do this, Local Planning Authorities maintain or have access to a Historic Environment Record, to help them assess the significance of heritage assets and their contribution to the environment, and help to predict the discovery of undiscovered assets of historic and archaeological interest in the future (NPPF para 187).

1.2.4 Assessing the impact of development that affects a heritage asset is based on the significance of the heritage asset. 'Great weight should be given to the asset's conservation irrespective of whether potential harm amounts to substantial, total loss or less than substantial harm to its significance.' (NPPF para 193). Any potential harm (either physical, or from development within its setting) must have a clear and convincing justification. In particular, substantial loss of Grade II designated sites should be exceptional, and Grade

[12] https://www.gov.uk/guidance/national-planning-policy-framework

I, II* and World Heritage Sites wholly exceptional (NPPF para 194). For designated heritage assets where substantial harm or total loss is necessary, public benefits must outweigh this harm or loss (NPPF para 195) and for non-designated heritage assets, the Local Planning Authority should take a balanced judgement. In all cases where enabling development occurs the LPA must assess whether it is sufficient to outweigh policy.

Planning Practice Guidance[13]

1.2.5 Planning Practice Guidance supports the implementation of the NPPF. It states that plan-making bodies should identify specific opportunities to conserve and enhance the historic environment in their plans. It gives further guidance on how to assess and understand heritage significance, the setting of a heritage asset and how to assess viable uses and public benefits.

1.3 Local Plan: Core Strategy and Development Management Policies

1.3.1 The Local Development Framework (LDF) is the spatial planning strategy for the Peak District National Park. It consists of a suite of planning policy documents which deliver the planning strategy; from high level strategic policy (Core Strategy[14]) to detailed policies on new development and amenity issues (Development Management Policies[15]). It also includes Neighbourhood Plans that have been adopted and Supplementary Planning Guidance which support policy delivery set out in the Core Strategy and Development Management Policies plan.

Core Strategy

1.3.2 The Core Strategy (2011) sets out the spatial strategy for the Peak District National Park. It details what the important landscape characteristics are that make up its special qualities and how we will manage development, to ensure we conserve and enhance the national park, in accordance with the purposes and duty set out in the Environment Act (1995).

1.3.3 Core Strategy policy GSP 1: Securing national park purposes and sustainable development is an overarching policy for all development within the national park affirming the legislative duty to conserve and enhance as set out in the Environment Act (1995).

1.3.4 Core Strategy policy GSP2 (*B)*: Enhancing the national park:

> *"Proposals intended to enhance the National Park will need to demonstrate that they offer significant overall benefit to the natural beauty, wildlife and* ***cultural heritage*** *of the area. They should not undermine the achievement of other Core Policies."*

[13] https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#overview-historic-environment

[14] https://www.peakdistrict.gov.uk/planning/policies-and-guides/core-strategy

[15] https://www.peakdistrict.gov.uk/planning/policies-and-guides/development-management-policies

1.3.5 Core Strategy GSP3: Development management principles, details how proposals for development will be assessed to ensure 'Development must respect, conserve and enhance all valued characteristics of the site and buildings that are subject to the development proposal.'

1.3.6 Core Strategy policy L1: refers to the valued characteristics and landscape character of the national park. The list of valued characteristics includes the following which are specific to heritage:

- natural beauty, natural heritage, landscape character and diversity of landscapes
- thousands of years of human influence which can be traced through the landscape
- distinctive character of hamlets, villages and towns
- trees, woodlands, hedgerows, stone walls, field barns and other landscape features
- significant geological features
- wealth of historic buildings, and registered parks and gardens
- cultural heritage of history, archaeology, customs, traditions legends, arts and literary associations
- special value attached to the national park by surrounding urban communities
- any other feature or attribute which make up its special quality and sense of place.

1.3.7 These demonstrate the importance of cultural heritage in the national park.

1.3.8 Core Strategy policy L3: Cultural heritage assets of archaeological, architectural, artistic or historic significance, focuses on development conserving, enhancing and revealing cultural heritage assets. It is clear that any harm would not be acceptable unless exceptional circumstances prevail. It refers to the Cultural Heritage Strategy, which will be superseded by the revised Landscape Strategy.

Development Management Policies

1.3.9 The Development Management Policies document was adopted in 2019 and builds on the strategic principles and policies set out in the Core Strategy. The following development management policies are most relevant to heritage issues.

1.3.10 Policy DMC5: Assessing the impact of development on designated and non-designated heritage assets and their settings. This policy builds on the requirements of the NPPF (2019) regarding the significance of a heritage asset as part of a development proposal. It sets out the information required to accompany applications for development that affect the significance of a heritage asset, including its setting, and the circumstances in which harm or loss to a designated or non-designated heritage asset would be considered acceptable.

1.3.11 Policy DMC6: Scheduled Monuments. Directs decision makers to policy DMC5.

1.3.12 Policy DMC7: Listed Buildings. Directs decision makers to policy DMC5 and sets out when development would not be acceptable unless clearly justified to the satisfaction of the LPA that it is less than substantial in terms of impact and is offset by public benefit, including optimal viable use and net enhancement to the listed building and its setting.

1.3.13 Policy DMC8: Conservation Areas. Directs decision makers to policy DMC5 and sets out the need to preserve or enhance character and significance, as well as the importance of preserving or enhancing views into, out of and within Conservation Areas. It also sets out what aspects of a Conservation Area should be taken into account when assessing a planning application for development, the level of detail required to accompany an application and when demolition would be considered acceptable.

1.3.14 Policy DMC9: Registered Parks and Gardens. Directs decision makers to policy DMC5 and details how their significance would be assessed using the national register and any other historic, botanic or ecological information.

1.3.15 Policy DMC10: Conversion of a heritage asset. This policy sets out when the conversion of a heritage asset would be acceptable, focusing on the character and significance of the asset, the surrounding landscape and/or built character and valued characteristics (as set out in the Core Strategy). It also details when a conversion to a dwelling (Core Strategy policy HC1C1) would be permitted.

Peak District National Park Design Guide[16]

1.3.16 The Peak District National Park Design Guide (2007) supplementary planning document, sets out advice on how to assess existing style and character and then moves onto providing advice on designing in sympathy, choice and use of materials, layout, how to use sustainable methods of construction and how to make alterations or extend existing properties sympathetically. Whilst this is an informative guide, it does not have the depth of advice that the Building Design Guide (1987)[17], a technical support document to the Design Guide (2007), which is comprehensive, well-illustrated and referenced by planners and agents.

Agricultural Developments in the Peak District Supplementary Planning Document (SPD) (2003)[18]

1.3.17 Agricultural Developments in the Peak District National Park SPD provides guidance on the location, form, construction, materials and landscaping of new agricultural buildings. In addition to this, it sets out types of farm diversification that could be acceptable and advises on whole farm planning.

[16] https://www.peakdistrict.gov.uk/planning/policies-and-guides/designguide
[17] https://www.peakdistrict.gov.uk/planning/policies-and-guides/designguide
[18] https://www.peakdistrict.gov.uk/__data/assets/pdf_file/0035/157868/Agricultural-Developments-SPD.pdf

Alterations and Extensions Supplementary Planning Document (SPD) (2014)[19]

1.3.18 Provides guidance on appropriate alterations, extensions and general changes to existing residential dwellings to ensure they fit well with their host building.

Conversion of Heritage Assets

1.3.19 A Supplementary Planning Document on Conversion of Heritage Assets is currently being written by the Authority (due for formal public consultation Spring 2021). It focuses largely on agricultural buildings but many of the principles set out will apply to other heritage assets. It will set out the main issues to address when considering converting a heritage asset for residential use namely:

- Understand the building and its setting;
- Work with the existing form and character;
- Follow a conservation approach;
- Create responsive new design;
- Use appropriate materials and detailing; and
- Conserve or enhance the setting.

[19] https://www.peakdistrict.gov.uk/__data/assets/pdf_file/0020/63164/PDNP-AlterationsExtensions-DesignGuide-2015-06.pdf

Part 2: Performance of Policy

2.1 What are we judging policy against?

Peak District National Park Management Plan (2018-2023)[20]

2.1.1 The Peak District National Park Management Plan (2018-2023) is a partnership plan for the Peak District. It sets out the issues and priorities for conserving and enhancing the special qualities of the national park and a delivery plan of actions to address these. It relies heavily on partnership working for the benefit of all. Each national park is required to identify its special qualities - attributes that are distinctive and significant to the place. The PDNPA has seven special qualities, of which two are relevant to the historic and built environment:

- Special quality 4 'Landscapes that tell a story of thousands of years of people, farming and industry' focuses on human activity which over many thousands of years has created a unique landscape. The landscape is rich in prehistoric monuments, grassy dales, open moorland and historic field patterns created by agriculture, relics of past industry including quarries, mills and mining, and trade and transport routes. The park's most famous monuments and buildings include the Bronze Age Nine Ladies stone circle, the 11th century Peveril Castle, and the stately houses and parkland of Chatsworth, Haddon Hall and Lyme Park.

- Special quality 5 'Characteristic settlements with strong communities and traditions' focuses on the characteristics of a settlement/area created by generations of life whether it be a farmstead with medieval origins, a settlement which grew as a result of local lead mining, or a nineteenth century planned estate village. Building layout, materials, street formation and the relationship of settlement to the surrounding landscape tell us a lot about the past. Today's peak district communities are proud of their cultural heritage and seek to maintain their community's traditions and events.

Landscape Strategy and Action Plan (2009-2019)[21]

2.1.2 The Peak District National Park Landscape Strategy and Action Plan 2009 – 2019 divides the Peak District National Park landscape into Landscape Character Areas based on broad areas of landscape with similar natural and cultural characteristics. These landscapes are the White Peak, Dark Peak, Derwent Valley, Eastern Moors and South West Peak. Within these areas, further Character Types can be identified. The strategy sets out the specific natural and cultural characteristics of each Area and 'provides a framework for describing an area systematically, ensuring that judgements about future

[20] https://www.peakdistrict.gov.uk/__data/assets/pdf_file/0025/84670/National-Park-Management-Plan-2018-2023-print-version.pdf

[21] https://www.peakdistrict.gov.uk/looking-after/strategies-and-policies/landscape-strategy

landscape change can be made based on knowledge of what is distinctive'. The strategy is currently being updated.

Core Strategy Spatial Objectives

2.1.3 The Core Strategy sets out the spatial objectives for planning policy for the whole Park and for each of the Character Areas.

- For the whole park, they are to manage development through close consideration of landscape character and conserve and enhance conservation areas.
- For the Dark Peak and Moorland Fringe it is to manage and enhance cultural heritage.
- For the White Peak and Derwent Valley they are to protect and manage the settled agricultural character and enhance cultural heritage.
- For the South West Peak it is to manage the distinctive historic character of the landscape.

2.2 Evidence: Annual Monitoring Reports

2.2.1 Annual Monitoring Reports (AMR)[22] record planning applications determined at planning committee that have either been approved contrary to policy or that have raised serious policy concerns. Those relating to cultural heritage planning policies are noted below.

Table 1: Planning Applications relating to cultural heritage issues approved contrary to policy or raising significant policy issues.

Approved contrary to policy			
AMR year 2012/13 NP/S/0612/0653	SEPARATION OF FORMER COACH HOUSE FROM MAIN HOUSE TO RECREATE TWO SEPARATE DWELLINGS	Core Strategy policy HC1	Both the Planning Committee and the Authority concluded that development should be granted as the proposal would result in the conversion of a vernacular building and would not cause any harm to the landscape.

[22] https://www.peakdistrict.gov.uk/planning/policies-and-guides/annual-monitoring-reports

AMR year 2014/15 NP/SM/0514/0468	Renovation and Change of Use of Former Shippon to Detached Dwelling	Core Strategy policies GSP1, GSP2, HC1	Building not valued vernacular, therefore no justification for open market housing. Members considered the proposed enhancement was sufficient in this case by ensuring the removal of other eyesore buildings
Raised significant policy issues			
2011/12 NP/DDD/0210/0174	Conversion of former mill building into two town houses and five holiday apartments	Core Strategy policies L1, RT3	Proposed scheme involves the conversion of the Mill to 2 open market houses and 5 holiday apartments. The creation of an additional permanent dwelling unit was considered to comply with Core Strategy policy HC1 as this was required in order to achieve the conservation and enhancement of a valued vernacular building.
2011/12 NP/DDD/0911/0896	Residential, employment and community development plus ancillary landscaping and infrastructure elements	Core Strategy Policies DS1 GSP1, GSP2, GSP3 and L3, and Local Plan Policies LC4 and LC5	Recommended for approval but the application was refused by the Planning Committee which considered that the scale of the proposed development to be out of keeping with the size of the existing village of Hartington and would be damaging to the landscape of the National Park and to the character and setting of the Hartington Conservation Area.
2013/14 NP/HPK/0812/0791	Change Of Use Of Vacant Barn To Holiday Cottage Including New Septic Tank Installation	Core Strategy policies GSP 1,2,3 L1, RT2 and saved local	Some concerns regarding the qualities of the building. However Members content That building was of sufficient vernacular merit and the development did not cause unacceptable landscape harm.

		Plan policies LC4 and LC8	
2014/15 NP/SM/1114/1132	Conversion of a redundant stone agricultural building into a residential dwelling to fulfil an affordable local needs housing requirement	Core Strategy policies GSP1, GSP3 and L1, saved Local Plan policies LC4 and LC8	The barn occupies a prominent and exposed position and presently contributes positively to the character and setting of the wider landscape of this part of the National Park. The proposed residential conversion of the barn could spoil the character and setting of the barn by the introduction of a domestic use and associated developments in this sensitive location. Members felt that there was a clear need for the dwelling and that it would not harm the landscape. Raises issues about the need to understand impact to heritage and historic landscape features from domestic conversions.
2015/16 NP/DDD/0915/0881	Construction of two local needs dwellings	Core Strategy policies GSP1, GSP3, L1, L3	Wardlow is listed as a settlement in the adopted development strategy DS1. However a major characteristic of this village in the open limestone plateau are the open spaces which draw the landscape into and through the street scene connecting the village to its wider landscape. 23 policies LC4, LC5. Consequently, whilst a local need had been demonstrated, officers were concerned that the proposed houses would harm the conservation merits of the area and that any local need should be met elsewhere in the village. In approving the scheme members considered that the application site was an acceptable location within a designated settlement and that the development allowed the basic character and appearance of the village to be retained.
2015/16 NP/DDD/1114/1184	Conversion of barn to dwelling	Core Strategy policies HC1, GSP1, GSP2, GSP3, L1, L2, L3 and saved Local plan policies LC4, LC8,	This application was the latest in a series of applications over many years (some of which were dismissed at appeal). The key issue was whether the conversion of an acknowledged valued vernacular building, which is distinctive in its landscape setting, would conserve and enhance the building and that setting. Officers considered that a permanent residential use would adversely affect the character and setting of the building, notwithstanding the fact that the proposed conversion was considered to be relatively

		LC16, LC17, LH1, LT11, LT18	sensitive. Additional information was received which demonstrated that the building was in need of repair otherwise it would fall into a state of dereliction. Members therefore concluded that the proposed scheme was the most effective way of conserving the building and its setting. The application was approved subject to a section 106 agreement which would help to achieve this.
2015/16 NP/DDD/0715/0713	Conversion of barn to dwelling	Core Strategy policies GSP1. GSP2, GSP3, HC1, HC2, L1, L2, L3. Saved Local Plan policies LC4, LC8, LC12, LC17, LH1, LH2, LT11, LT18	This application was also the latest in a series of applications over many years, some of which were dismissed at appeal. The key issue was whether the conversion of a valued vernacular building, which is distinctive in its landscape setting, would conserve and enhance the building and that setting. Officers acknowledged that the building was in need of works to allow sympathetic repairs to the building, including re-roofing. The application was therefore recommended for approval and this was endorsed by Members.
2015/16 NP/SM/0615/0548	Change of use of barn/former blacksmith's workshop to dwellinghouse	Core Strategy Policies HC1(a), DS1, GSP1, GSP2, GSP3, L1,	This application related to a relatively modest building of some vernacular merit on the edge of a settlement. The applicant made a case of need for the conversion to a dwelling, but this was not within policy. Officers considered that the building did not require the impetus of an open market approval to conserve or enhance the building. Members concluded that the building was of some vernacular merit and that its conversion would not cause any harm to the building or its landscape setting. They did not consider that the applicant met the policy requirements relating to local needs housing. They therefore approved the application as an unrestricted dwelling.
2015/16 NP/DDD/0916/0881	Temporary use of land for a horticultural show, including the erection of	Core Strategy policies: GSP1, GSP2,	Officers recommended that a three year permission would allow the Authority to retain some control and monitoring and enable them to work with the applicant on any issues that

	temporary structures, on a yearly basis, with associated operational development, river crossings and other features and the creation of temporary show gardens	GSP3, DS1, L1, L2, L3, RT1, E2, T1, T2, T7 Saved Local Plan policies: LC4, LC6, LC9, LC15, LC16, LC17, LC18, LC20, LR1	arose from the operation of the show. Officers noted that Section 66 of Planning (Listed Building and Conservation Areas) Act 1990 establishes that any harm to Listed Buildings gives rise to a presumption in favour of refusal and requires clear and convincing justification. As the harm is considered by Historic England to be "less than substantial", the Authority can weigh this harm against the public benefits of the proposal. The application was approved for 10 years, subject to conditions Members were mindful of the National Park's statutory purposes and the impacts on the site but considered that with a personal consent to the applicant and conditions including traffic controls and a liaison committee the public benefits of the proposal would outweigh the harms. The Committee considered that there would public benefits in respect of income that would be spent on maintaining and restoring heritage assets at Chatsworth, the benefits to the local economy and the educational benefits to visitors to the show. A condition requiring the submission of an annual management plan to be submitted and agreed by the Authority was imposed, together with conditions regarding annual monitoring of the ecology and archaeology impacts, traffic controls including for construction traffic and the setting up of a liaison committee.

2.3 Other Evidence and Data

Cultural Heritage Summit (2015/2016)

2.3.1 The Management Plan background topic paper on cultural heritage makes specific reference to a Cultural Heritage Summit (2015/16) run by Peak District National Park Management Plan partners. The event highlighted the lack of resources in cultural heritage, in particular:

- A lack of acknowledgement of the importance cultural heritage has in the social, economic and environment growth and development of the national park
- A lack of funding opportunities to enhance/ better reveal/support cultural heritage initiatives

- A lack of traditional local building materials and skills, which leads to a dilution of local character and appearance
- A lack of up-to-date Conservation Area Appraisals
- A lack of planning controls and incentives
- A reduction in research opportunities
- Vulnerability of cultural heritage from changes in farm management and practices
- A need for a joined up approach to interpretation and engagement and more of it

State of Heritage Report

2.3.2 The State of Heritage report is 'living' data set that reports on key cultural heritage facts such as the number of heritage assets the National Park has (set out at paragraph 1.4), which heritage assets are at risk, and where there are data and research gaps. It reports that 53% of adults state that heritage is 'very important to them personally' and that 74% of adults support the planning system to protect heritage. The report highlights a need to understanding the effectiveness of planning policy through further research to quantify the enhancement or protection of landscape and built environment features through the monitoring of relevant planning policies.

2.4 Conclusion

2.4.1 Heritage and built conservation policies perform well judged against applications that are given permission 'contrary to policy' or that 'raise significant policy issues', since these are within acceptable thresholds. There are just a few applications each year that give cause for concern.

2.4.2 The State of Heritage Report and the Local Plan Review 'Spatial Strategy' Topic Paper both note that the cumulative impact on special qualities of permissions granted in accordance with policy, is not measured. For example, we know how many permissions we have granted for extensions to houses in Conservation Areas, but we have no objective process to determine whether the impact of these is positive.

2.4.3 Development Management Policies (2019) provide guidance on assessing the impact on significance and recognising the contribution of non-designated heritage assets. However our approach to understanding significance is still inconsistent so new local plan policies should provide further guidance. The '*Conversion of Historic Buildings SPD'* will introduce guidance on evidence required early on in the planning application process.

2.4.4 New policy should also clarify how to determine the curtilage of a listed building as this is the responsibility of the local authority but open to interpretation. New policy should emphasise the owners' responsibility to provide correct and sufficient information.

2.4.5 Currently, the local plan policies and government Planning Practice Guidance provide flexibility on how the authority determines a non-designated heritage

asset and this is supported by officers. The PDNPA is currently seeking funding to help support the creation of a Local List.

Part 3: Issues and Evidence Driving New Policy

3.1 Issues and Evidence Driving New Policy

Housing White Paper: Planning for the Future (2020)[23]

3.1.1 The Housing White Paper sets out the government's intentions to digitize planning. Specifically, it states in Proposal 17: Conserving and enhancing historic buildings, that Local Planning Authorities will be required to identify the location of internationally, nationally and locally designated heritage assets (page 58). It goes on to state that Listed Buildings will need to respond to climate change and incorporate energy efficiency measures to support the UK's commitment to zero carbon by 2050 (need ref), possibly through an alternative route to the planning system.

National Design Guide (2019) [24]

3.1.2 The National Design Guide supports delivery of the NPPF and sets out 10 characteristics to reflect the government's priorities for well-designed places. They include referencing context, identity and built form, which are of particular importance in conserving and enhancing our built and landscape heritage.

Historic England advice notes

3.1.3 Historic England has produced a number of advice notes and reports on heritage in planning[25]. Its note on Local Plans [26] states that Local Planning Authorities need to develop a positive strategy for heritage, which should be a 'plan for the maintenance and use of heritage assets and for the delivery of development including within their setting that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness' (para.10). A clear set of strategic policies for heritage will help sustainably manage the historic environment (para.14).

3.1.4 The Good Practice Advice Note: The Setting of Heritage Assets (GPA 3)[27], explains the concept of setting, advices on setting issues and how setting can contribute to significance. It has a staged approach to proportionate decision making and is to be used in conjunction with the NPPF and NPPG. As mentioned in the Performance of existing policy section, understanding significance is an area where better policy or guidance is required and this Advice Note will assist in this matter.

3.1.5 Over recent years there has been a move towards understanding how heritage buildings can adapt to climate change[28] and carbon lifecycles of a building in terms of its built and operational carbon output. Historic England's

[23] https://www.gov.uk/government/consultations/planning-for-the-future
[24] https://www.gov.uk/government/collections/planning-practice-guidance
[25] Good Practice Advices (GPAs), Historic England Advice Notes (HEANs), Technical and conservation advice, Conservation Principles 2011, Heritage Counts
[26] https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/

[27] https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/
[28] www.climateheritage.org

report: There's No Place Like Old Homes[29], sets out the climate change benefits to refurbishing and adapting existing buildings with a range of case studies that demonstrate simple but effective methods to sympathetically repurpose old buildings.

3.1.6 The Sustainable Traditional Building Alliance (STBA)[30] and the London Energy Transformation Initiative (LETI)[31] are also an excellent sources of information on the topic, including advice notes and case studies, on how to retrofit heritage/existing properties sustainably. This is referenced further in the Climate Change and Sustainable Building Topic Paper.

Agricultural Buildings Report

3.1.7 As a large proportion of development in the Peak District relates to agriculture, the Agricultural Buildings Report was produced in March 2020 to explore the potential impact of this development. The report focused on new agricultural buildings, which averaged 49 per year (2011-2018) with an average size of 334sqm (which approximately equates to a building 20m x 17m). This substantial level of development in the Peak District may result in landscape harm. Further research could be undertaken into the extent that planning policies allow for a sustainable approach to modern farming.

Parish Statements[32]

3.1.8 Parish Statements (2020) are a collaborative piece of work between the PDNPA and parish councils, looking at the different contributing factors that make up a community. These include population and employment data, land use mapping and commentary from the parish council on community life. The contributions to the statements made by parish councils on what they value demonstrate clear community support to respect and care for their historic and cultural legacy.

Climate Change Vulnerability Assessment[33]

3.1.9 The PDNP Climate Change Vulnerability Assessment (Draft December 2020) assesses the vulnerability of the special qualities of the PNDP to climate change. The table below summarizes the impact of climate change on the special qualities that relate specifically to cultural heritage. It can be seen that the heritage of the Peak District landscape is highly vulnerable to climate change and the heritage of the settlements as moderately vulnerable. Further information on the vulnerability assessment is set out in the Climate Change and Sustainable Building topic paper.

[29] https://historicengland.org.uk/content/heritage-counts/pub/2019/hc2019-re-use-recycle-to-reduce-carbon/
[30] http://responsible-retrofit.org/
[31] https://www.leti.london/
[32] https://www.peakdistrict.gov.uk/looking-after/living-and-working/your-community/village-plans
[33] Document PDNP Climate Change Vulnerability Assessment: Peak District National Park

Table 2: The Vulnerability of the PDNP Cultural Heritage (PDNP Climate Change Vulnerability Assessment (Draft December 2020)

Special Quality 4: Landscapes that tell a story of thousands of years of people, farming and industry	This special quality is highly vulnerable to climate change. Of the 18 special quality features assessed, 6% have been rated as 'very high' on our scale and almost 70% were rated as 'high'. The rest have been rated as 'moderate', and no features were given a 'low' rating
Special Quality 5: Characteristic settlements with strong communities and traditions	This special quality is moderately vulnerable to climate change. Of the ten special quality features assessed, no features were rated as 'very high' on our scale and only 20% were rated as 'high'. Most features (70%) were rated as 'moderate', and 10% were given a 'low' rating.

3.2 Summary of new evidence

3.2.1 The evidence from the documents above suggests that heritage is still very much at the forefront of planning policy and decision making as it provides context, identity, a sense of place and a connection to the past for which new development should respect and respond to.

3.2.2 The UK's commitment to zero carbon by 2050 will require a large amount of properties within the national park to sensitively retrofit energy efficiency saving measures. Possible changes to legislation may enable this to occur without planning permission. We need to ensure that owners are supported with guidance and advice to ensure that the significance of heritage assets is maintained.

3.2.3 There is a strong government message to improve digital infrastructure both in maintaining a local authority record of heritage assets and for communities to connect with each other to champion their heritage assets.

Part 4: Requirement for Further Evidence

4.1 Requirement for Further Evidence

4.1.1 We know that development that is contrary to policy, or that raises significant policies issues, is rare. In this respect, local plan policies are performing well. However we need to understand more about the cumulative effect on special qualities of the development that we permit in accordance with policy. We need to develop and implement a robust methodology to do this.

4.1.2 We need to improve understanding of ‘significance’ and ‘curtilage’, which lends itself to further guidance and case study examples to explain written policy.

4.1.3 Further research could be undertaken into the extent that planning policies allow for a sustainable approach to modern farming whilst protecting heritage assets.

4.1.4 As we move towards a greater emphasis on meeting the UK’s zero net carbon target in 2050 we need to give greater focus to these issues. There is a good range of nationally available data and guidance on adapting built heritage assets to address climate change that could be brought into local plan policy with supportive supplementary planning guidance.