# **Paper 7: Historic Environment**

**Gloucester City Plan** 

Background Topic Paper for Policy Development



## Introduction

Gloucester has a unique and rich heritage formed by historic buildings, street patterns, archaeological remains, landscape and other physical remnants of its past. A city of intense urban activity for nearly two thousand years, it has a special legacy of nationally significant heritage from all historic periods. The heritage of the city is a central component in the identity of the city. It defines much of what is locally distinctive about the city and that impacts on how the city's residents and visitors feel, use and perceive the city. This has wide reaching implications on the image of the city, the economy, tourism, legibility and the health and wellbeing of the city's residents.

The city's heritage, along with Gloucester's diverse communities, marks what is unique about Gloucester. How that heritage is managed, presented and connected with has a crucial impact on how Gloucester is perceived locally, nationally and internationally. It is central to Gloucester's civic pride, status, sense of place and the sense of continuity in times of change.

The Local Plan will protect the City's unique and significant heritage assets through the protection and identification of designated and non-designated heritage assets and their settings.

Heritage assets are defined as a building, monument, site, place, structure, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and non-designated heritage assets.

Development should safeguard or enhance both designated and non-designated heritage assets and the character and setting of areas of acknowledged significance. The degree of protection afforded to a heritage asset will reflect its position within the hierarchy of designations. Development will be required to respect and respond positively to designated heritage assets and their settings, avoiding loss or harm to their significance. Proposals that involve securing a viable future use or improvement to an asset on the Heritage at Risk register will be supported. Development which is likely to have a significant adverse impact on designated heritage assets and their settings which cannot be avoided or where the heritage asset cannot be preserved in situ will not be permitted. Where fully justified and assessed, the Council may consent to the minimal level of enabling development consistent with securing a building's future in an appropriate viable use. Development in Gloucester should ensure the city's unique archaeological and historic character is protected or enhanced.

This topic paper sets out the current national and local evidence base, and looks at locally specific issues facing the heritage assets in the City. It concludes with a proposed Policy to be developed as part of the City Plan.

# **Nationally**

There is a comprehensive set of international, national and local legislation and guidance that impinges on the historic environment. The key components at the national level are currently:

- The National Planning Policy Framework
- Planning (Listed Buildings and Conservation Areas) Act 1990
- The National Planning Practice Guidance
- Ancient Monuments and Archaeological Areas Act 1979

The National Planning Policy Framework (NPPF) was published on 27<sup>th</sup> March 2012. Its central theme is the 'presumption in favour of sustainable development'. One of the key dimensions of sustainability is protecting and enhancing our historic environment. The NPPF therefore commits us to conserving and enhancing the historic environment.

"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. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution made by the historic environment to the character of a place." NPPF, Chapter 12, Paragraph 126

"Local planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment. They should also use it to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future. Local planning authorities should either maintain or have access to a historic environment record." *Paragraph 169* 

"Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted." *Paragraph 141* 

Crucially for Gloucester the NPPF also states that:

"Where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision." Paragraph 130

The Government have produced the National Planning Practice Guidance (NPPG) to accompany the NPPF. It states that:

"The conservation of heritage assets in a manner appropriate to their significance is a core planning principle. Heritage assets are an irreplaceable resource and effective conservation delivers wider social, cultural, economic and environmental benefits.

Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in everyday use to as yet undiscovered, undesignated buried remains of archaeological interest.

In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic changes may not be necessary.

While there is no requirement to do so, local planning authorities are encouraged to consider making clear and up to date information on their identified non-designated heritage assets, both in terms of the criteria used to identify assets and information about the location of existing assets, accessible to the public.

In this context, the inclusion of information about non-designated assets in Local Plans can be helpful, as can the identification of areas of potential for the discovery of non-designated heritage assets with both archaeological or historic interest." Further details of relevant guidance and legislation include:

- European Landscape Convention adopted at Florence on 20/10/2000 (European Treaty Series No. 176)
- Convention for the Protection of the Architectural Heritage of Europe adopted at Granada on 3/10/1985 (European Treaty Series No. 121)
- European Convention on the Protection of the Archaeological Heritage revised (The Valletta Treaty) 1992 (European Treaty Series No. 143)

Historic England is the public body that looks after England's historic environment. They provide advice and guidance on planning, champion historic places, identify and protect the country's heritage and provide expertise at a local level.

Historic England have produced a number of 'Good Practice Advice' (GPA) notes and 'Historic England Advice Notes', all of which are of significance in the context of the plan making and decision taking process.

'GPA1 – Local Plan Making' provides supporting information on good practice, particularly looking at the principles of how national policy and guidance can be put into practice. It sets out information to help local planning authorities make well informed and effective local plans. A full list of the Historic England guidance used in the formulation of the City Plan can be found in the 'Evidence Base' section of this Topic Paper.

# Locally

#### **Joint Core Strategy**

The JCS Submission November 2014 contains policy SD9: Historic Environment which states that:

- 1. The built, natural and cultural heritage of Gloucester City, Cheltenham town, Tewkesbury town, smaller historic settlements and the wider countryside will continue to be valued and promoted for their important contribution to local identity, quality of life and the economy.
- 2. Development should make a positive contribution to local character and distinctiveness, having regard to valued and distinctive elements of the historic environment.
- 3. Designated and undesignated heritage assets and their settings will be conserved and enhanced as appropriate to their significance, and for their important contribution to local character, distinctiveness and sense of place. Consideration will also be given to the contribution made by heritage assets to supporting sustainable communities and the local economy. Development should aim to sustain and enhance the significance of heritage assets and put them to viable uses consistent with their conservation whilst improving accessibility where appropriate.
- **4.** Proposals that will secure the future conservation and maintenance of heritage assets and their settings that are at risk through neglect, decay or other threats will be encouraged. Proposals that will bring vacant or derelict heritage assets back into appropriate use will also be encouraged.
- 5. Development proposals at Strategic Allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision) demonstrating that the potential impacts on heritage assets and appropriate mitigation measures have been assessed.

# **Responses to Previous Consultations**

Below is a selection of responses from residents and key stakeholders to previous City Plan consultations.

#### **City Plan Scope Consultation Responses**

"It has a great heritage (cathedral, docks and buildings) and these could be linked by more attractive routes and retail opportunities."

"Gloucester has so much to offer with its historic past and this should be built upon to encourage tourism and festivals to the area. To celebrate Gloucester's history howabout a new series of Blue Plaques in all the historic areas?"

"Gloucester's immensely important historic environment needs to continue to positively contribute to the regeneration of its centre. This should be underpinned by an understanding of Gloucester's designated and undesignated heritage assets and the contribution they provide to its different character areas."

"The historic environment can create a sense of Civic Pride and social and cultural bonds to the city more naturally than any other form of cultural asset. Therefore, there should be

more emphasis on the role of the historic environment in the regeneration potential for the town and that the current version is not strong enough in underlining this important role."

"One of the greatest assets of the city is in its underground wealth of archaeology. There is a need to recognise and embrace this as a positive feature to the city's fundamental make-up. Perhaps it could be handled as another opportunity to educate through community-led archaeological projects and interpretation."

# City Plan Part 1 – Context and Key Development Principles Consultation Document Responses

"The implications of 'built environment' imply above ground heritage only. We recommend in line with the NPPF that your plan should embrace both designated and non-designated heritage assets"

"...developers, planners etc have been aloud to build shops, flats etc, that have no respect at all for the local surroundings, history of the area at all none look at the flats/carpark in the barge arm of the docks as one example, hideous, they look like nothing from the historical past at all, if in future there are new buildings or ones that are going to be refurbished in the centre, please at least give them old style frontages, to make the main streets more historic looking, even persuade future developers to even purchase old building from elsewhere, like they have at the black country museum, which brings in masses of tourist."

## City Plan Part 2 – Places, Sites, City Centre Strategy Consultation Responses

"More should be done to make the most of heritage, which is currently under-utilised."

"...need more explanatory signage and interpretation."

"Make more of the Docks / Quays as an evening /leisure / dining destination and the waterside location / heritage / water-based industries."

"There is a specific need to address more fully the environmental issues including built heritage, landscape and biodiversity in the City Plan area."

"There are separate sections on employment, retail, offices, tourism etc. The consultation document is completely devoid of any reference to built heritage, landscape, and biodiversity issues."

"There are several references to historic heritage and cultural services in the document but they seem to have confined comments largely to city council cultural attractions. It may be helpful to add a reference to Gloucestershire Archives since it is a cultural/heritage resource for the whole of Gloucestershire and for South Glos but is located in Kingsholm. It also attracts a fair number of tourists (some of the local hotels advertise that they are close to Gloucestershire Archives). Our service also fits in with the desire to promote Gloucester as home of the "knowledge industry" as it is all about protecting and promoting Gloucestershire's unique information."

"For a city with such a great history, medieval architecture, the Docks and the city's location these attributes are woefully exploited. Coming from Bath, where it could be argued that over-exploitation abounds, I find it incredible that Gloucester's rich past is

overshadowed by Cheltenham's mono-Georgian glory and feel that more needs to be done to package the cathedral, city centre, docks, military and industrial heritage into an infrastructure package of hotels, restaurants adjacent to the main attractions. Furthermore coach and car parking should not be neglected but needs to be discrete and within walking distance."

# **Local Objectives**

The future key strategic priorities and objectives for the City have been set out in the previous City Plan work (City Plan Scope, City Plan Part 1, City Plan Part 2 –Places, Sites and City Centre Strategy), through the Gloucester City Vision 2012-2022 and through Gloucester's Cultural Vision and Strategy 2016-2026.

A historic environment policy for the City Plan will need to meet and support these objectives.

#### **Gloucester City Vision:**

- Growing the City's tourism business through promotion and marketing of the City's existing assets, as well as encouraging new attractions within the City.
- Celebrating the City historic buildings and working to bring older buildings back into use, using them as a cornerstone of the City's visitor economy.
- Building pride in our neighbourhoods and in the City, by building on our past and working together to improve the present and future.
- Celebrating our rich and diverse heritage and culture.

#### City Plan Part 1:

- Objective 1 To ensure development contributes to deliver a transforming City which brings regeneration benefits, promotes sustainable development and reduces the need for greenfield development by making the most efficient use of previously developed land and buildings.
- Objective 8 To deliver a City to enjoy by protecting and improving the City's leisure, recreation and environmental assets. Valuable heritage, areas of open space, allotment provision, nature conservation, sensitive landscapes and areas of recreation will be improved and protected, particularly Alney Island, the setting of Robinswood Hill and areas of urban fringe. The wide range of leisure and sporting opportunities that the City already enjoys will be supported along with the development of a vibrant and safe evening and night time economy to deliver a city which appeals to all age groups and encourages a greater proportion of Gloucester's visitors to stay overnight.
- Objective 13 To deliver a connected City and ensure that all new development achieves a high standard of design, which reflects the local context and takes advantage of any opportunities to improve the character and quality of an area and is well integrated with the City and its surrounding countryside.

#### City Plan Part 2:

Strengthen the commercial and historic role of the Cross and Gate streets as well as its central point of pedestrian activity.

• Strengthen Gloucester's position as a city of great historic importance by reconnecting historic assets with the wider city centre.

#### Gloucester's Cultural Vision and Strategy 2016 – 2026:

Objective 3 – Develop a Vibrant City Centre

• Find a better way of telling Gloucester's heritage and history story involving our museums, tourist information centre and other attractions, including consolidating the expected impact of Project Pilgrim.

## Local Challenges and Issues in Gloucester

Whilst Gloucester does have a rich and unique heritage, it also has a number of local challenges that need addressing through the City Plan:

- There is a current perception by applicants and developers that only the area marked on the current local plan map (2001) as 'Principal Archaeological Area' is of archaeological significance, when in fact there is potential for significant archaeology across the whole city. The City Plan will need to see a move away from the 'Principal Archaeological Area', in favour of a more generic overarching policy across the city. As significant archaeology could be present on any development within the City given its rich historical context.
- Findings from City Plan consultations indicate that residents think that the council should do more to make the most of the city's heritage assets. Depending upon ownership and resources it is not always possible or even appropriate to preserve every heritage asset as a tourist attraction or museum piece. However there are practical things that can be done to engage local community groups and make more of the city's heritage assets:
  - **A.** Seek opportunities for more community based archaeology and built heritage survey work to be undertaken
  - **B.** Use development opportunities to bring into use, maintain, enhance and secure the future of heritage assets. all assets including non listed and also public realm and streetscape
  - **C.** Maintain interpretation boards, continue to update plaques and provide information available to residents and visitors.
  - **D.** Ensure that where development involves the recording of heritage assets that these recordings are publicly displayed and exhibited.
- The Conservation Area management policies that form part of the Conservation Area Appraisals are not fully utilised in the development management process and opportunities to improve the Conservation Areas are often missed. This is mainly due to the fact that the Conservation Area Appraisal and Management documents were produced after the Gloucester City Council Second Stage Deposit 2002 Local Plan and there are limited policies which can be used as they are only supplementary planning guidance. Specific policy inclusion in the City Plan heritage policy will be necessary.

- Gloucester has a number of Buildings at Risk and Vulnerable Buildings. There have been a number of prominent heritage assets that have been left vacant and abandoned for many years. The NPPF paragraph 130 clearly states that where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision. Due to the issue of Buildings at Risk it is felt appropriate that although this point is iterated in the NPPF, it is also included in any local policy as part of the City Plan.
- Ensuring that development is locally distinctive and builds positively upon Gloucester's unique character and heritage.
- As part of the regeneration process it is important that improvement of the public realm and historic streetscapes are included, this is often missed due to the lack of a policy for this in the 2002 Plan, although it is identified in the conservation area appraisals

# Historic Environment Policy for the City Plan

This policy should be read in conjunction with the latest version of Policy SD9 Historic Environment of the Joint Core Strategy.

#### **Supporting Text**

#### Conserving and enhancing the historic environment

The historic environment, consisting of archaeological remains, historic buildings, townscapes and landscapes, including locally significant assets and their settings in addition to designated and statutorily protected features, will be valued, protected, preserved, enhanced and managed for its contribution to character, local distinctiveness and sustainability. New development should seek to safeguard, and where possible enhance, heritage assets and their settings. Development will be required to respect and respond positively to designated heritage assets and their settings, avoiding loss or harm to their significance. Proposals that involve securing a viable future use or improvement to an asset on the Heritage at Risk register will be supported.

## Positive strategy for the conservation and enjoyment of the historic environment

To ensure the conservation and enjoyment of the City's Historic Environment the Council will:

Continue to contribute to the maintenance and enhancement of the Gloucestershire Historic Environment Record;

- Review and regularly update:
  - SPDs
  - Conservation Area Appraisals and Management Plans:
  - Article 4 directions; and
  - The local list.

- Produce and maintain a heritage at risk register, and proactively seek to reduce the number of heritage assets on the register by:
  - Exploring opportunities to bring assets into viable use; and
  - Appropriate enforcement.
- Produce and regularly review condition assessments for all heritage assets directly owned or managed by the City Council.
- Seek opportunities for community engagement, education and outreach activities as part of the planning process.

## Describing the significance of heritage assets

Where planning applications are submitted for sites with archaeological interest:

- Applicants should seek early discussion with the City Archaeologist prior to the submission of an application in order to establish the likely level and scope of supporting information required.
- In the first instance applications on sites of archaeological interest will be required to provide an archaeological desk-based assessment. This assessment should:
  - Be informed by a search of the Gloucestershire Historic Environment Record;
  - Be produced in accordance with a brief from the City Archaeologist; and
  - (where possible) assess the impact of the proposed development on archaeological remains.
- Following receipt of the desk-based assessment the City Archaeologist may judge that archaeological evaluation is required in order to understand the potential impact of the development proposals on the significance of any archaeological remains. Any evaluation will:
  - Be outlined in a brief produced by the City Archaeologist;
  - Be undertaken in accordance with a Written Scheme of Investigation (approved by the City Archaeologist); and
  - The results will be outlined in a report to be submitted in support of the planning application.

Where applications are likely to affect a built heritage asset, or its setting:

- Applications should be supported by a description of the asset's historic, architectural and archaeological significance with an appropriate level of detail relating to the likely impact of the proposal on that interest. A site analysis identifying the qualities which contribute to local character, including development patterns, history, its landscape and views, and how these can contribute to the quality and sustainability of the proposed development should also be provided. This may include:
  - A built heritage assessment;
  - An assessment of significance;
  - · A setting assessment; and
  - An impact assessment.

 Applicants should seek early discussions with a Conservation Officer prior to the submission of an application in order to establish the scope and nature of the supporting information required.

## **E1: Historic Environment Development Management**

The City Council will support development that conserves the significance of designated and non-designated heritage assets including archaeological remains and locally listed buildings.

- Great weight will be given to the conservation of the City's heritage assets. New
  development affecting a designated or non-designated heritage asset or its
  setting, including alterations and additions, will be expected to make a positive
  contribution to its character, appearance and significance.
- Proposals affecting designated and undesignated heritage assets and their settings should demonstrate that they meet the following guidance:
  - The use of traditional, local materials and adherence to local building techniques and details, where appropriate;
  - The conservation of features and elements that contribute to the special interest of a heritage asset, including structures forming part of the curtilage, in particular the structural integrity and historic plan-form of listed buildings and historic building groups;
  - Appropriate use of the heritage asset that is compatible with the conservation of its significance;
  - The location, form, scale, massing, density, height, layout, roofscape, landscaping, use and external appearance of developments within conservation areas should conserve and enhance the special historic and architectural interest of the conservation area;
  - Development involving substantial harm to or loss of designated heritage assets will only be granted in exceptional circumstances (wholly exceptional circumstances for designated assets of the highest significance);
  - Proposals affecting a non-designated heritage asset (including where identified through the planning process) should not harm its special interest and development involving substantial harm will be resisted unless significant public benefit has been clearly and convincingly demonstrated in accordance with the requirements of the NPPF;
  - When determining applications, nationally important archaeological remains which are currently non-designated will be considered subject to polices applying to Scheduled Monuments;
  - The condition of an historic building resulting from deliberate damage and neglect will not be taken into account in any decision.
  - The City Council will support applications that make provision for the preservation in situ of archaeological remains.

Gloucester has a unique and nationally important heritage. The city contains a large number of heritage assets which should be protected or enhanced for the benefit of the city, its residents and visitors, now and into the future.

The historic environment is not just important for its own sake; it adds value to regeneration, improves quality of life, attracts economic investment and contributes greatly to tourism. It is also a source of significant local pride, contributing to local identity and acting as a valuable cultural and educational resource.

In addition to this the historic environment is a finite and non-renewable resource and its protection is therefore an essential element in ensuring a sustainable future. The reuse of historic buildings can contribute to sustainability through retaining rather than wasting embodied energy and avoiding use of energy and materials for new build. Further guidance can be found in Energy Conservation in Traditional Buildings, English Heritage, 2008 http://www.climatechangeandyourhome.org.uk/live/

## E2: Recording and Advancing Understanding of Heritage Assets

Where development will result in the loss (wholly or in part) of a heritage asset, the City Council will require developers to record and advance understanding of the significance of that asset prior to or during development. The appropriate form of mitigation employed will be dependent on the nature of the impact but may include:

- Historic building recording;
- Archaeological watching brief;
- Archaeological evaluation;
- Archaeological excavation; and
- Preservation in situ by design.

Mitigation will be undertake in accordance with a Written Scheme of Investigation approved by the City Council. All new information gathered from investigation and mitigation will be appropriately disseminated and any archive material deposited with the Gloucester City Museum and Art Gallery. Opportunities will be sought for community engagement, education and outreach activities to be integrated into any mitigation works.

The heritage of the city belongs to everyone who lives, works or visits Gloucester. As custodians of this heritage it is important to ensure that an accurate record of Gloucester's Heritage is documented and maintained, and that this information can be freely used by the City Council and its residents.

## E3: Buildings of Local Importance

Where planning permission, Conservation Area Consent or any other form of relevant permission is required, it will not be granted if it would involve the demolition of, or substantial alteration to the external appearance of, any building designated as of local importance on the Local List unless:

- all reasonable steps have been taken to retain the building, including examination of alternative uses compatible with its local importance; and
- retention of the building, even with alterations, would be demonstrably impracticable;
- and the benefits of the redevelopment scheme outweigh the retention of the building.

#### E4: Shopfronts, Shutters and Signs

There will be a presumption in favour of retaining good quality traditional shopfronts where they make a positive contribution to the character of the area and are capable of repair.

Proposals to alter or create a new shopfront, shutter or signs should take account of the guidance provided in the Shopfronts SPD and any subsequent amendments.

To ensure that shopfronts, shutters and signs are of a high standard of design and appearance and do not detract from the overall quality of the urban environment.

# **Objectives Met**

## **Joint Core Strategy**

**Strategic Objective 4** – Conserving and enhancing the environment.

Ensure that planning policy and decisions: Protect and enhance the JCS area's unique historic environment, archaeological heritage and geological assets

**Strategic Objective 5** – Delivering excellent design in new developments Ensure that all new developments are valued by residents by:

- Integrating them well with existing communities and provide well-located infrastructure which meets the needs of residents
- Creating a strong sense of place through high quality and inclusive design that respects and enhances local distinctiveness.

#### **City Plan Part 1 Key Development Principles**

**Objective 1** – To ensure development contributes to deliver a transforming City which brings regeneration benefits, promotes sustainable development and reduces the need for greenfield development by making the most efficient use of previously developed land and buildings.

**Objective 8** - To deliver a City to enjoy by protecting and improving the City's leisure, recreation and environmental assets. Valuable heritage, areas of open space, allotment provision, nature conservation, sensitive landscapes and areas of recreation will be improved and protected, particularly Alney Island, the setting of Robinswood Hill and areas of urban fringe. The wide range of leisure and sporting opportunities that the City already enjoys will be supported along with the development of a vibrant and safe evening and night time economy to deliver a city which appeals to all age groups and encourages a greater proportion of Gloucester's visitors to stay overnight.

**Objective 13** - To deliver a connected City and ensure that all new development achieves a high standard of design, which reflects the local context and takes advantage of any opportunities to improve the character and quality of an area and is well integrated with the City and its surrounding countryside.

#### **Local Evidence Base**

## **Historic Environment Record (HER)**

The Gloucestershire Historic Environment Record (HER) forms a large part of the evidence base for the City (and the wider county). The HER is a database of all known heritage assets of archaeological interest in Gloucestershire. The HER also maintains records for designated and undesignated built heritage assets within the County. The City Archaeologist maintains HER records for the area of Gloucester City and District. The HER is available for enquires from the general public and academics but its main function is to provide the evidence base for the planning process (in accordance with paragraph 169 of the NPPF).

#### **Heritage Assets**

These comprise both designated and undesignated heritage assets: Gloucester City Plan

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- designated heritage asset is defined in the NPPF as a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation
- undesignated heritage assets are archaeological sites, historic buildings and other structures, historic designed landscapes including local listing.

The definition of a Heritage Asset is "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)" (NPPF 2012)

#### Designated heritage assets

Heritage Asset	Number in Gloucester City	National Resource (Approx.)
Entries in the statutory list (listed buildings) *	470	375,000
Grade I	36	9,500
Grade II*	49	22,000
Grade II	385	350,000
Conservation Areas	14	10,000
Article 4 Directions	2	
Registered Parks and Gardens	0	1,600
Scheduled Monuments	25**	20,000
World Heritage Sites	0	20

<sup>\*</sup> The number given above does not reflect the number of buildings covered by listing. Structures in the curtilage of a listed building may also be protected. In addition one listing may include a whole complex of buildings.

Further information, including location, level of protection provided by designation, reasons for designation and other related issues can be found on Historic England's Heritage Gateway, the HER and the Council's web-site.

#### **Non-designated Heritage Assets**

The City Council does not have an adopted local list at present but Conservation Officers are developing a draft list whereby buildings or areas of interest have been identified through the planning process. An essential part of the Councils work is to preserve and enhance the City's rich and varied architectural heritage. Historic buildings are important and finite assets and often specialist technical advice is required when owners considering repairs or alterations. Many of these buildings have been recognised nationally in terms of their significance and are nationally Listed. The local list identifies heritage assets that are valued locally for their architecture and/or historic value, but which are not of sufficient importance to warrant national statutory listing (i.e. grade I, II\* and II.)

<sup>\*\*</sup> Some occupy more than one site.

The Historic England good practice guide for local heritage listing (2012) describes the role of the local list as "a means for a community and a local authority to jointly identify heritage assets that are valued as distinctive elements of the local historic environment. It provides clarity on the location of assets and what it is about them that is significant, guaranteeing that strategic local planning properly takes account of the desirability of their conservation."

The NPPF advises local authorities that in assessing proposals which only have local heritage status ("non-designated assets") "a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset." (NPPF paragraph (135).

#### **Local List**

As part of the planning application process non-designated heritage assets will be identified and these will be given the relevant consideration for retention and reuse. The City's Conservation Area Appraisals highlight buildings that contribute positively to the Conservation Area and potential candidates for local listing will be reviewed as part of any forthcoming conservation area reviews.

Non-designated heritage assets may also be identified through the Neighbourhood Planning process, providing an opportunity for local communities to identify potential local assets which are of historic value and hold local community significance.

The City Council is also undertaking a townscape character survey of the City and this will also provide an opportunity for potential buildings to be identified as local list candidates, new conservation areas and also possible new designations.

The Gloucestershire HER includes details of more than 2000 archaeological sites in the district that have not been formally 'scheduled' and these non-designated sites are considered during the planning process.

#### **Conservation Area Appraisal and Management Recommendations.**

Gloucester City has fourteen adopted Conservation Areas, which cover most of the City Centre, as well as parts of Hempsted and Hucclecote Green. The areas were subject to a review during 2006-7 and on the 20 September 2007 all 13 Conservation Area Appraisals were adopted by the Council as interim planning guidance. A further conservation area, Denmark Road Conservation Area (no 14), was designated adopted by the Council on 27 November 2008.

The appraisals provide a detailed character assessment of the conservation area and identify particular buildings, features and landmarks which contribute to its conservation status. The management recommendations are in the form of policies and these give guidance on how the preservation or enhancement of the conservation area can be achieved and managed.

It is recognised that conservation areas need to be continually reviewed in order to assess the effectiveness and success of the policies contained within the Appraisal and Management documents, and also to reflect on any changes in the area, either positive or negative.

In 2013 a review of the Southgate Street Conservation Area Appraisal and Management document was undertaken. The choice of Southgate Street as the first area to be reviewed in this round resulted in part from the opportunities arising out of the Southgate Street Townscape Heritage Initiative (THI); this is a heritage-led regeneration programme, funded jointly by Heritage Lottery Fund (HLF) and Gloucester City Council. The THI will enable significant restoration works to be undertaken to key buildings within the area through grant assistance, including many actions identified within the Conservation Area Appraisal and Management document; these include restoration / reinstatement of traditional timber windows, doors and railings, plus repairs to the external structure of properties.

It is planned to undertake further reviews of the other Conservation Area Appraisal and Management documents as resources permit.

#### **Article 4 Directions**

Gloucester currently has two Article 4 directions, at St Michael's Square and Southgate Street Conservation Area. Further details of the Article and the properties affected can be found at <a href="http://www.gloucester.gov.uk/resident/planning-and-building-control/environmental-planning/historic-environment/Pages/Article-4-Direction.aspx">http://www.gloucester.gov.uk/resident/planning-and-building-control/environmental-planning/historic-environment/Pages/Article-4-Direction.aspx</a>

The Southgate Street Article 4 was assessed and designated in 2013 due to a condition placed on funding for the Southgate Street Townscape Heritage Initiative Scheme by HLF as part of their management requirements for the scheme area.

#### Strategic Assessment of Land Availability (SALA) Site Assessment Report

The site historic environment assessments for SALA will aim to identify any further archaeological, built environment or historic landscape character constraints on the sites identified for possible allocation for housing and/or employment uses. The assessments will allow the council to understand the constraints of each site so that an informed judgment can be reached on the appropriateness (or otherwise) of development allowing an accurate potential capacity figure to be reached. The evidence and information generated by the historic environment assessments will help the evaluation of individual sites. These assessments are being developed in accordance with Historic England's GPA1 The Historic Environment in Local Plans, GPA2 Managing Significance in Decision-Taking in the Historic Environment and GPA3 The Setting of Heritage Assets.

## **Buildings at Risk**

The Buildings at Risk register brings together information on all listed buildings (and scheduled monuments with substantial masonry remains) within the city which are known to be 'at risk' through neglect or decay, or are vulnerable to becoming so. The purpose of the register is to raise awareness of the heritage assets in the city which are considered to be at risk and the progress being made, if any, to get them back into a good state of repair.

In July 2001 the first buildings at risk list was established with some 50 listed buildings being identified as being 'at risk' or were vulnerable of becoming so. Some 30 of these original entries have since been removed from the register due to their future having been secured. However, there have subsequently been two complete re-surveys of the City's designated assets, the most recent being during the Spring/Summer of 2013 due to Historic Funding as part of a pilot project reviewing whether Grade II buildings should be added to the national At Risk Register. This comprehensive review resulted in new buildings being added to the register. On the current register there are 26 buildings at risk and 17 vulnerable assets.

The Buildings at Risk register and the Vulnerable Buildings register can be found online at <a href="http://www.gloucester.gov.uk/resident/planning-and-building-control/environmental-planning/historic-environment/Pages/Buildings-At-Risk.aspx">http://www.gloucester.gov.uk/resident/planning-and-buildings-control/environmental-planning/historic-environment/Pages/Buildings-At-Risk.aspx</a>

Historic England maintains a list of all designated heritage assets in England that are considered to be at risk covering; Grade I and II\* listed buildings and Grade II buildings in London, structural scheduled monuments, places of worship (all grades), registered parks and gardens, registered battlefields, protected wreck sites and conservation areas. The register South West regional for the can be downloaded from: https://content.historicengland.org.uk/images-books/publications/har-2015-registers/swhar-register2015.pdf/

Gloucester City Council also has 8 heritage assets identified on the national English Heritage "Heritage at risk register 2015" and two Conservation Areas at risk.

## **Archaeology**

The city has a particularly rich archaeological heritage, containing remains of national and international importance. The district has produced evidence of human activity from the Mesolithic period onwards. Settlement activity of Neolithic and Bronze Age date has also been identified. The District was a sparely populated rural landscape at the end of the Iron Age and the City itself developed from a Roman fortress around about AD97. Gloucester was an important centre in the later Saxon period and was heavily associated with Aethelflaed 'the Lady of the Mercians' who oversaw the reconquest of the midlands from the Danes in the early tenth century. The City remained significant during the medieval period boasting a royal castle and impressive churches and monasteries. The role of the city during the siege of 1643 had a profound impact on the outcome of the English Civil War and therefore the development of parliamentary democracy. The industrial heritage of the city, focused mainly around the docks is of regional importance.

The Council also refer to "Archaeology in Gloucester a policy for city and district" 1974. Much of the content of this document is still relevant today. However, it is intended to produce an update to this document during 2016.

## **Supplementary Planning Documents**

Development Affecting the Sites of the Historic (Archaeological) Environment SPD – Interim Adoption August 2008

Shopfronts – Design Guidelines for Gloucester (published in the mid 1990s). Revised version currently being produced.

Conservation area appraisal's and management proposals (2007-2013)

- Area 1 The Spa
- Area 2 Southgate Street
- Area 3 The Docks
- Area 4 Eastgate & St Michaels
- Area 5 City Centre
- Area 6 The Barbican
- Area 7 Cathedral Precincts
- Area 8 Worcester Street
- Area 9 London Road
- Area 10 Barton Street
- Area 11 Hucclecote Green
- Area 12 Hempsted
- Area 13 Kingsholm
- Area 14 Denmark Road

#### **National Evidence Base**

- The National Planning Policy Framework
- Planning (Listed Buildings and Conservation Areas) Act 1990
- The National Planning Practice Guidance
- Ancient Monuments and Archaeological Areas Act 1979
- European Landscape Convention adopted at Florence on 20/10/2000 (European Treaty Series No. 176)
- Convention for the Protection of the Architectural Heritage of Europe adopted at Granada on 3/10/1985 (European Treaty Series No. 121)
- European Convention on the Protection of the Archaeological Heritage, revised (The Valletta Treaty) 1992 (European Treaty Series No. 143)

#### **Historic England Advice**

- GPA1 Local Plan Making
- GPA2 Managing Significance in Decision-Taking in the Historic Environment
- GPA3 Setting and Views
- Advice Note 1 Conservation Areas
- Advice Note 2 Making Changes to Heritage Assets
- Advice Note 3 The Historic Environment and Site Allocations in Local Plans

#### **Future Work**

- Develop a Heritage Strategy to include positive action point for the enjoyment of the historic environment.
- Update the "Archaeology in Gloucester a policy for city and district" 1974
- Update the "Shopfront Design Guide"

- Townscape Character Analysis (currently in production)
- Develop and adopt the Local List

# Monitoring

The City Plan will align with the monitoring framework within the JCS. More detailed Indicators and targets (such as those in the table below) will be developed in consultation with the City Council Neighbourhood Management team and others following the end of the City Plan consultation 16<sup>th</sup> January to 27<sup>th</sup> February 2017.

Indicator	Target	Source	Period
Listed Buildings, Conservation	Align to Local	Buildings at Risk	Annually
Areas and Scheduled	Authority's targets or	register.	
Monuments on the 'at-risk	net reduction on an		
register'	annual basis		
Net changes in the number of	No net loss	Internal	Annually
Listed Buildings, Registered		monitoring	
Parks and Gardens,			
Conservation Areas,			
Battlefield and sites of			
archaeological importance			
including Scheduled			
Monuments			