

Historic England consultation Advice on the maintenance and adaptation of traditional farm buildings

The Heritage Alliance

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Introduction

The Heritage Alliance is the key coalition of heritage interests in England, bringing together over 100 mainly national organisations which are in turn supported by over 7 million members, Friends, volunteers, trustees and staff. Heritage Alliance members own, manage and care for the vast majority of England's historic environment. They include organisations which seek to influence the planning and development processes, and organisations representing commercial, private, third sector bodies and individuals who themselves carry out rural development. The Alliance takes a strong interest in policies affecting the historic environment. It has a Rural Heritage Advocacy Group which draws on the knowledge and expertise of its membership, and which has drawn up this response.

The Heritage Alliance welcomes this opportunity to respond to Historic England's consultation on its draft advice:

- *Historic England Advice Note 9: the adaptive reuse of traditional farm buildings*
- *The adaptation of traditional farm buildings: a guide to good practice*
- *The maintenance and repair of traditional farm buildings: a guide to good practice.*

In general terms, the planning system needs to balance the three aspects – economic, environmental, social – of sustainable development, in line with the National Planning Policy Framework (NPPF). It should recognise that rural heritage, landscapes and communities cannot flourish without economic activity, and housing, and community and recreational facilities, but that environmental and social factors need to be carefully balanced alongside economic factors in plan-making and in planning decisions. The maintenance and reuse of traditional farm buildings contribute to sustainable development, and the sympathetic conversion of redundant traditional farm buildings allows rural employment or housing without the need for new-build development.

The maintenance and adaptive reuse of traditional farm buildings

Traditional farm buildings are (as the draft documents say) important both in themselves and as vital parts of rural landscapes.

Almost all of the hundreds of thousands of these buildings are economically redundant (and only a small proportion are likely to be maintained by Rural Development funding), and they are probably the largest single category of heritage buildings at risk. The solution for heritage at risk is generally, where possible, sympathetic conversion to a new use which will be economically viable, and give the building a new role in the community by accommodating new enterprises and jobs, and/or housing.

We therefore welcome sympathetic conversions of traditional farm buildings, ie those carefully designed to respect the building's heritage significance and landscape value, taking maximum cognisance of the story of farming and rural communities which the building portrays. What this means is defined in long-established advice from Historic England and elsewhere, in the 2006 advice documents on maintenance and on conversion which the draft documents are intended to replace, the 2015 Farmstead Assessment Framework, and the series of Regional historic farmstead character statements. The Institute of Historic Building Conservation and other Heritage Alliance member organisations have campaigned for carefully-formulated conversions of farm buildings since the 1980s.

Conversely, however, unsympathetic conversions damage the building's heritage significance and harm surrounding landscapes.

Policy therefore should be focused on the sympathetic re-use of traditional farm buildings, and on sympathetic design. Well-designed proposals should (unless there are site-specific problems like flood risk or noise) get consent, but badly-designed proposals should not.

National and local planning policy

The Heritage Alliance is concerned that that principle is not the basis of current policy.

At a local level, local planning authority (LPA) policies usually favour development within the boundaries of large settlements, but strongly discourage development outside those boundaries. Most redundant traditional farm buildings are outside those boundaries, so these policies (whatever their other merits) discourage their re-use. LPAs do have design and heritage policies, but in practice in traditional farm buildings cases the design merits of proposals, and the desirability of safeguarding heritage, do not usually seem to be seen as important criteria in decision-taking. This discourages proposals involving traditional farm buildings, and it also encourages those who do seek consent to focus on hiring planning consultants to overcome policies against development outside settlement boundaries, rather than using the best designer to create the most sympathetic design. The Heritage Alliance would prefer see more emphasis on design, and on heritage conservation.

Similarly, at a national level, the Government has prior approval schemes¹ intended to encourage the adaptation of farm buildings to new uses. Again, however, though design is listed as one of the approval criteria, Government has encouraged LPAs to focus on other issues by erecting other hurdles like the 'capable of functioning as a dwelling' and 'otherwise impracticable and undesirable' 'tests'². LPAs are therefore taking prior approval decisions on these criteria, not design. Again, these are leading applicants to focus on hiring planning consultants to overcome these 'tests', rather than using the best designer to create the most sympathetic design.

The Heritage Alliance would therefore like to see more emphasis on design, and more emphasis on heritage conservation, and it has urged Government to modify its advice to LPAs, so that it is clear to LPAs that planning permission should be granted for well-designed conversion as defined above (unless there are genuine site-specific reasons for refusal), but not granted for poorly-designed conversion. The Heritage Alliance has also asked Government to modify the Prior Approval rules similarly.

¹ General Permitted Development Order 2015, Schedule 2, Part 3, Classes Q, R, and S).

² see Planning Practice Guidance, What are permitted development rights?, paragraphs 101-109.

Historic England advice

Historic England advice is important and has three core roles:

1. To stress the important role of traditional farm buildings in history and rural landscapes, and impart an understanding of this context, including local and regional variation and the great variety of different farm building types.
2. To stress the twin dangers (i) of redundancy leading to their loss from rural landscapes, but also (ii) of unsympathetic conversion damaging their heritage significance.
3. In the light of 2 above, to give practical advice on analysis of significance, context, and setting, as well as on maintenance and adaptation.

In general terms, we feel that the three documents have the potential to do this well. But we have a few comments as follows:

Communicating the advice

Historic England's current advice on traditional farm buildings – the 2006 advice on maintenance and on conversion, the 2015 Farmstead Assessment Framework, and the regional advice on farmstead character – are very highly regarded by those who are aware of them and use them, but we do not think they are being sought out and used as much as they should be. The problem does not lie in the advice, but in getting its message across to LPAs and to owners/developers.

This is probably in part the policy issue noted above: because current planning policy seems in practice to de-prioritise heritage and design, LPAs themselves and owners/developers do not see the need to focus on heritage and design issues because good design and sympathetic handling of heritage significance do not seem to make much difference to outcomes in the planning system. Although Historic England advice cannot change this by itself, it can help by covering and emphasising the points listed in 1-3 above.

This must also however be partly a communication issue. Historic England might be able to communicate its advice more effectively by:

- (i) Making the advice as user-friendly as possible for each of its key audiences (especially LPAs, owners, developers, and professional advisers). The current advice listed above already does this well, and the new generation of advice needs to improve on this (see also below).
- (ii) Giving the document a web presence – this might use the Farmsteads Assessment Framework as the core document, with links to the other documents and other advice. This might have different 'landing pages' for the different audiences identified above, briefly alerting each audience to Historic England's understanding of the challenges they face, directing each audience to the appropriate parts of the advice, and ensuring that each audience is aware of the range of relevant advice Historic England provides.
- (iii) Targeted marketing. This might for example target all rural LPAs, and farmers and land managers who are likely to own redundant traditional farm buildings, or more specific audiences, eg those who might be contemplating farm diversification involving the re-use of farm buildings. This might for example be done using targeted email and/or targeted internet advertising, taking stands at relevant events like the annual Farm Business Innovation event in

November, which might reach that specific owner audience, or by placing articles in relevant industry publications like the CLA and NFU magazines.

The user-friendliness of the advice

As above, Historic England's advice on traditional farm buildings is highly regarded by those who are aware of it and use it. In general it is written in clear language and addresses its audiences in ways which demonstrate Historic England's understanding of the issues, and explains the process of analysis, and maintenance and adaptation work, in clear language accessible to those who use it, and those who might use it.

It is important to ensure that the new advice is at least as effective. Much of the new advice is similar to the 2006 versions, but there are some areas where material seems to have been omitted, especially introductory sections about the history and variability of farm buildings. The consultation draft may also in some places have a more theoretical and less practical feel than the earlier advice, and may have lost some of its day-to-day usefulness as a result.

Conclusion

The twin threats of redundancy and dereliction on the one hand, and ill-informed conversion on the other, are very real. Redundant traditional farm buildings are under grave threat, and these dangers threaten nearly all of the hundreds of thousands which still remain. Historic England has done a great deal over 15 years to identify the issues and to rehearse the means by which they can be addressed. The new advice and the ways in which the threats and the opportunities are presented and communicated to all stakeholders, especially to Government, to LPAs, and to owners/ developers, need to be very clear if they are to address these threats and take advantage of the opportunities more effectively than in the past.