ENGLISH HERITAGE

Guidance on developing HER-derived Alerts and Constraints Mapping

LUC Prepared by LUC
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Introduction

1   Introduction

Purpose of this guidance

1.1   This guidance has been developed as part of the English Heritage 'HER21' programme. The initiative is intended to assist England's Historic Environment Records (HERs) and Local Planning Authorities (LPAs) meet the requirements of the **National Planning Policy Framework** (NPPF).

1.2   The document is primarily intended to help LPA officers in the preparation of the historic environment evidence base for Local Plans, and for HER staff responsible for supplying source data. Alerts and constraints mapping, as defined in this document, provide a valuable starting point for understanding the potential effects of development on heritage assets. However, they are not intended as a substitute for the expert interpretation and advice provided by local authority curatorial archaeologists and conservation officers.

1.3   The guidance deals solely with mapping of known heritage assets. Understanding the archaeological potential of proposed development sites, or development plan land allocations, requires professional context-specific advice.

NPPF compliance

1.4   The national policies set out in the NPPF place a premium on decision-making based on sound understanding of the nature, extent and level of assets' significance. Therefore ensuring that decision-makers have access to accurate and appropriate information on the historic environment is critical. This is a three stage process, comprising:

- contributing to the evidence base for development plans;
- crafting an appropriate policy framework for the local historic environment; and,
- making the information accessible and useable for developers and decision-makers alike.

1.5   The information supplied to LPAs by HERs has a key role to play in each of these stages, providing a robust baseline and acting as a trigger for consultation and relevant assessment work to provide a basis for decision-making.

> **Paragraph 169 of the NPPF requires Local Planning Authorities to "***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***
>
> **To this end, the policy states that LPAs "***should either maintain or have access to a historic environment record.***"**

Need for high quality mapping products

1.6   As the process of planning becomes increasingly reliant on technology, ensuring information on heritage assets is well integrated with key systems is a national priority. This includes:

- Corporate GIS systems, enabling planning officers to access key environmental information
- Development Management and land charges systems
- Online e-planning systems

1.7   This can help to ensure that planning staff have access to reliable, usable spatial data that clearly depicts known heritage assets – particularly where additional regulatory processes are required.

1.8   Helping developers to recognise the heritage assets on and in the environs of proposed sites via access to online mapping is a significant opportunity to promote early engagement and bolster the role of pre-application discussions in securing appropriate recognition, assessment and protection of heritage significance.

It is recognised that not all HERs have access to a GIS and will therefore be unable to implement the recommendations of this guidance in the short term. However, as this is a significant barrier to NPPF compliance, it is hoped that HERs and their partners will be able to prioritise the necessary capacity-building.

Role of this guidance

1.9   The guidance offers advice to those specifying, providing and using spatial data on the historic environment for planning purposes. It should be noted that it is not intended as a prescriptive technical document. Instead, it is intended to provide general principles to guide HERs, LPAs and their historic environment advisors in the development of mapping products that are fit-for-purpose under the NPPF and achieve a consistent national standard.

1.10   HERs and Local Authorities are encouraged to pursue innovative, locally-appropriate solutions within this framework – as is already the case in many areas.

Key concepts

'Constraints'

1.11   For the purposes of this guidance, the term '**constraints**' refers solely to designated assets and areas that require **additional regulatory processes** to enable development as a result of statutory protection. These are:

- Scheduled Monuments and Archaeological Areas

- Listed Buildings

- Conservation Areas

- Protected Wrecks

1.12   This reflects the fact that the presence of such assets is a constraint on the development ***process*** – since additional consents are required – rather than necessarily on the ***outcome*** of proposals.

1.13   Similarly, the division between 'constraints' and 'alerts' mapping is not intended as a measure of significance of assets.

'Alerts'

1.14   Core '**alert**' maps should depict other assets.

1.15   The key requirement for NPPF-compliant alerts data is screening out HER records that do not relate to assets within the meaning of the NPPF. However, events and other records that are unrelated to assets contribute to our understanding of the historic environment, and are potentially useful in developing separate layers depicting historic environment/archaeological potential.

1.16   The information making up this layer will vary depending on the character of the local authority area, the nature of its historic environment and the types of information recorded by the Historic Environment Record. However, it is anticipated that this will, at minimum, incorporate:

- Non-statutory national and international designations (World Heritage Sites, Battlefields, Registered Parks and Gardens)

- Historic Environment Record assets

- Other locally-designated assets (e.g. Locally Listed Buildings[1] or designated landscapes)

1.17 There is significant potential to incorporate a wider range of data, as many HERs currently do. Where appropriate, this could include locally important historic landscapes (e.g. derived from HLC data) and areas of townscape importance.

1.18 Alerts maps may also play an important role in highlighting key priorities for enhancement of the local historic environment – potentially providing developers with important opportunities to add value to their scheme and the local area. Many heritage assets at risk could benefit from such an approach.

> Developing effective alerts and constraints mapping complements the work already underway in a number of HERs, supported by English Heritage, on characterisation-based sensitivity mapping. Alerts and constraints mapping can therefore be seen as adding the asset-scale detail to support landscape-scale sensitivity analysis, ensuring HERs and LPAs have appropriate information to understand the historic environment, and historic assets, at both strategic and site-specific levels.

Early and effective engagement

1.19 From paragraph 188 onwards, the NPPF highlights the value of pre-application discussions between developers and planning authorities as a means of identifying issues at the earliest possible opportunity. This is particularly true of cases involving historic environment assets, where early engagement with curatorial archaeologists and/or conservation officers can have a positive influence on scheme design. Necessary investigations can result in significant delays and additional costs which can affect the viability of development, therefore making developers aware of their likely responsibilities can be helpful in managing expectations.

1.20 Promoting effective engagement through alerts and constraints mapping is a two-stage process:

1 Making information available to the public – ideally online – to highlight sensitivities, the need for consultation and, where relevant, additional consents

2 Ensuring data is available to trigger consultation during the planning process, ideally before applications are submitted and the 'processing clock' starts – helping to reduce pressure on both developers and LPAs

1.21 'Front-loading' the process provides developers with a more realistic impression of the potential impacts of the proposals and the scope of any studies that should accompany their application. Similarly, it can afford LPAs a chance to highlight opportunities for enhancement of the historic environment that could be delivered through well planned and designed development.

Themes

1.22 The document is structured to reflect key themes emerging from the background research that informed its development.

- **Partnership**: bringing together the right combination of expertise and resources

- **Fitness for purpose**: meeting the needs the local historic environment, and the requirements of the NPPF, without disproportionate impacts on resources

- **Integration**: taking a holistic view of where alerts and constraints mapping can add value to the planning process, and where processes to aid their development can be streamlined with wider work programmes

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[1] See the EH Good Practice Guide for Local Heritage Listing http://www.english-heritage.org.uk/caring/listing/local/local-designations/local-list/

2
Building a partnership

2   Building a partnership

2.1   Successful planning for the historic environment requires close partnership working between planning authorities and Historic Environment Records. While every LPA in England should have access to an HER, it is recognised that the relationships between LPAs, their historic environment advisors (curatorial archaeologists and conservation officers) and HERs differs widely – from in-house, fully integrated services to joint services run by third parties.

2.2   However, policy and information requirements are universal. It is therefore recommended that Local Planning Authorities are proactive in seeking to assess their relationship to the HER and curatorial support and help to instigate the changes necessary to achieve compliance with the NPPF. It is recognised that how this is taken forward at the local level is likely to vary in response to available resourcing and the needs of the local historic environment.

Roles and responsibilities

Local planning authorities

2.3   Local planning authorities are the 'first line of defence' for historic environment assets. The requirements of the NPPF have the potential to place significant demands on authorities' resources and expertise, necessitating a partnership approach with HERs, national agencies and other service providers (e.g. upper tier authorities). There is also the requirement to support communities in developing Neighbourhood Plans will also have implications with regard to provision and interpretation of information on the historic environment.

2.4   In using and developing alerts and constraints mapping, LPAs are ultimately responsible for how this information is incorporated within policy frameworks, made available to officers and used in decision-making. LPAs are therefore advised to take the lead in:

- Auditing existing data holdings

- Setting the agenda for data requirements and management

- Ensuring roll-out of mapping products through corporate systems

- Establishing timescales for updates and review

- Ensuring good communication across service areas

- Identifying staff training needs

2.5   The process should bring together staff involved in development planning and development management. Where present, any local authority historic environment service (i.e. Conservation Officer, DM archaeologists and landscape advisors) should also be involved[2].

2.6   This need not be an onerous process and could be integrated to some extent within pre-existing programmes of work – notably in evidence base collection for Local Plans. Where shortcomings in the existing evidence base and data holdings are identified, LPAs should be proactive in initiating contact with their HER and archaeological curatorial planning advisors and defining a project-based approach to addressing the issue.

Historic environment records

2.7   As the principal local repository of historic environment information and expertise, HERs are an important resource for LPAs, developers and communities alike. However, their potential contribution to the planning process should be secured through the establishment of strong, well-

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[2] Where these services are outsources, appropriate consultation with providers is recommended

defined relationships with LPAs, backed by a wide-ranging appreciation across the planning service of their function and capabilities.

2.8 In developing alerts and constraints mapping, it is anticipated that HERs will take the lead in:

- Advising on the wider significance and sensitivity of the local historic environment, and how this can be best reflected in mapping products and, where appropriate, policy frameworks

- Spatial analysis and collation of datasets

- Delivering updates and planned enhancements to agreed timetables

- Where resources allow, delivering training/guidance to key LPA staff to facilitate adoption and use of datasets

Establishing relationships

2.9 It is important to recognise the range of relationships that exist between LPAs and HERs across England. While many are well integrated within local authority structures, often within a wider Historic Environment Service, others may be physically and professionally isolated from planning colleagues making frequent contact and close working difficult.

2.10 Achieving compliance with the NPPF necessitates closer cooperation than may currently be the case. Both HERs and LPAs should be proactive in seeking to identify and build on the positive aspects of existing relationships, while seeking to improve cooperation and joint working, based on a mutual appreciation of requirements, roles and responsibilities.

Understanding requirements

2.11 HERs developing datasets for use in planning should seek to work with LPAs to understand:

- What are the specific functions of the dataset(s)?

- Are there local sensitivities or characteristics that may necessitate a particular approach?

- Who are the end user groups for the dataset(s)?

- What is their level of knowledge regarding the historic environment?

- How will the dataset(s) be made available?

- IT environments (e.g. corporate GIS, development management and land charges systems)

- How will it integrate with other environmental information?

2.12 In addition, partners should seek to:

- Identify the '**gatekeepers**' that will facilitate integration of alerts and constraints mapping (or, conversely, could inadvertently act as a barrier if not properly engaged in the process)

  - E.g. data management / IT service staff who may be responsible for managing, updating and disseminating data through corporate systems

- Involve key stakeholders, particularly local authority planning archaeologists / historic environment services and, where appropriate, landscape advisors

Formalising relationships

2.13 Where possible, partners should seek to formalise the nature and scope of their relationship with regard to the provision of mapping products. This will help to ensure that responsibilities, timescales and deliverables are clear and work can be effectively managed.

Ensuring certainty in work planning and resource commitments is critical in partnership working. Where **Service Level Agreements** (SLAs) exist between LPAs and HER/parent authorities, partners could consider including data requirements and update schedules in future revisions of the SLA. This may be a useful mechanism in formalising expectations on all parties.

Alternatively, drawing up a less formal concordat that defines similar parameters may also be an effective approach.

Useful case-studies on the benefits of SLAs are provided in a recent English Heritage publication.

Specifications

2.14   Partners should work together to develop data and project specifications, ensuring that products are well-defined and that standards are implemented from the outset. Developing mapping products within clear parameters is critical to ensure efficient working for the HER, and to help LPAs prepare their systems and processes for the new data.

2.15   How partners decide to organise the process of developing NPPF-compliant mapping products will be determined by local factors. However, setting out a workflow to deliver the agreed data is a useful step in setting and achieving quality benchmarks.

2.16   Following nationally defined standards for data, and metadata, is increasingly important. HERs and LPAs should have regard to the need to share data across administrative boundaries, and should seek to ensure that their information conforms to recognised standards.

Maintenance schedules

2.17   Alerts and constraints mapping data should be subject to a rolling programme of review and improvement. This should be driven by the internal programme of updating the HER and receipt of revised national designation datasets. It is for LPAs and HERs to assess the resource implications of updates and enhancements, however costs should be weighed against the wider benefits of compliance and the potential for time and effort savings accrued by through 'front loading' the planning process.

2.18   Using the best available evidence in development management should be a key aspiration for LPAs, improving certainty for developers, stakeholders and communities alike while enhancing the quality of decision making.

3
Fitness for purpose

3 Fitness for purpose

3.1 The core purpose of mapping products generated by HERs for use in planning is to add value to the process, contributing to appropriate local policies, ensuring that appropriate consultation and assessment are triggered at the earliest opportunity and that the relevant consents are sought in a timely fashion. The ultimate aim is to contribute to better-informed, timely decision making on applications for planning permission.

3.2 To optimise the benefits of alerts and constraints mapping, where possible these products should be developed in parallel with the evidence base for Local Plans. In this way, local policies can be devised that manage change in an appropriate manner, conserve what is significant and helps heritage assets contribute to sustainable development. Equally, LPAs and HERs should not wait until the next local planning cycle to implement alerts and constraints maps. Mapping should also be frequently updated to ensure that it reflects the current state of knowledge of the local historic environment.

3.3 In turn, this should provide decision-makers with sufficient information to make a determination based on the best available evidence on the significance and sensitivity of assets affected by development.

3.4 It is not English Heritage's intention to impose a prescriptive approach to data management as this could be disproportionately resource intensive and potentially counterproductive. It is for LPAs and HERs to determine whether the current level of service and information provided is appropriate to meet the needs of the NPPF and to prioritise work to achieve this aim. In many cases, the information exists and will require minimal manipulation to achieve a high standard of coverage.

NPPF information requirements

Development planning

3.5 The information held by HERs is a key resource in establishing the evidence base for development plans. LPAs are encouraged to work with HERs and curatorial colleagues to integrate the processes of evidence-gathering to contribute to local plans and compiling new alerts and constraints mapping. This process creates a range of opportunities, including:

- Compiling datasets of internationally and nationally designated assets (download the most up-to-date data from the EH website)
- Feeding directly into developing constraints maps
- Improving recording of under-represented assets (e.g. undesignated parks, gardens and designed landscapes)
- Revisiting local designations and consider need for new/altered Conservation Areas or locally listed assets

3.6 Where new information is generated, this should be fed back to the HER to ensure that local records are kept up to date and can be incorporated in alerts mapping.

3.7 Mapping products developed as part of the plan-making process should be subject to the same filtering procedures used in alerts and constraints maps for development management.

3.8 LPAs are advised to involve the HER and curatorial service at an early stage to ensure they have a comprehensive understanding of the NPPF's requirements and that data and mapping requirements can be developed accordingly, taking into account local character, priorities and sensitivities.

3.9 It is recognised that not all LPAs will be currently be engaged in evidence base collection.

Development management

3.10 NPPF is clear that it is for developers to provide a description of the significance of heritage assets and their settings affected by proposals. Alerts and constraints mapping, whether publicly available or otherwise, should not be considered as an alternative to appropriate consultation and appraisal of HER information and other relevant sources by suitably qualified professionals.

Functions

3.11 The role of constraints and alerts mapping can be reduced to two main functions:

- Defining courses of action: e.g. regulatory processes, consultation and assessment; and

- Providing information – although this is secondary, as the LPA response will be determined by the advice provided by the curatorial archaeologist and/or conservation officer.

Defining process

3.12 In the context of development management, the process implications of the potential or confirmed presence of historic environment assets are fundamental. These define the courses of action taken by both the developer and the planning authority. For example, if a proposed development site intersects the:

- **Constraints layer**: additional application for consent is required, as well as the requirements for consultation and assessment of the likely impact on the significance of the asset(s) in question

- **Alerts layer**: triggering appropriate consultation and assessment of the likely impact on the significance of the asset(s) in question

3.13 This limits the need for interpretation of datasets by the planning officer validating or processing the application and, in line with the NPPF, places the responsibility on the developer to undertake the necessary consultations and assessment work.

3.14 Process-based datasets are also perhaps better-suited to deployment through online systems in that they can provide developers with a clear course of action.

Providing information

3.15 As noted above, although the onus is on the developer to collate the best available evidence on the significance of affected assets, alerts and constraints maps can serve a useful function in signposting to relevant sources of information – for instance, using hyperlinks to access records on the Heritage Gateway, National Heritage List for England and other online resources. However, for the purposes of development management, the bulk of information should come from consulting the HER and specialist advisors.

Building blocks

IT systems

3.16 The availability of GIS in HERs is a prerequisite for the development of NPPF-compliant alerts and constraints mapping. For LPAs, it may be possible to integrate datasets within dedicated development management systems – although access through corporate GIS systems is a desirable addition.

Integration with other data-led projects

3.17 Many HERs produce datasets for non-planning use which can inform development of alerts and constraints mapping. Experience of similar processes of data screening, editing and simplification will be useful in applying the advice in this document.

Data standards

3.18   Alerts and constraints mapping are fundamentally spatial depictions of **policy** and **process** information rather than information about the historic environment. Ideally, the necessary data standards for historic environment data (e.g. MIDAS Heritage and the INSCRIPTION thesaurus[3]) will be implemented well 'upstream' of alerts and constraints mapping.

3.19   HERs should therefore continue to focus effort on ensuring the component datasets are structured in line with current data standards and best practice guidance.

Constraints mapping

3.20   As noted above, the key requirement of constraints mapping is to depict assets to which additional regulatory processes apply. Where possible, LPAs should encourage such applications for consent to be made in parallel with applications for planning permission.

Available data

3.21   English Heritage makes Scheduled Monument, Listed Building and protected wreck polygon data available to download from the EH website. Partners should ensure that the most up to date designations data is used.

3.22   Local planning authorities are responsible for the designation of Conservation Areas and should make relevant spatial data available to HERs.

Processes

3.23   Ensuring the most up-to-date datasets are used is the most important aspect of compiling constraints maps. Where HERs maintain their own datasets of designated assets, where possible these should be maintained on a similar schedule to central updates from English Heritage.

Polygons

3.24   Where HERs have GIS integration, only assets depicted as polygons can be readily used for the development of alerts and constraints mapping. However, it is acknowledged that many HERs still make use of point data, particularly for recording historic buildings (in line with centrally-available Listed Building datasets).

3.25   English Heritage will not be undertaking conversion of existing LB data to asset extent polygons – instead they are depicted on the National Heritage List for England mapping search as triangular polygons, with new records being added as accurate extents in line with other types of designation data.

3.26   Bringing together polygon datasets should be a relatively straightforward process. The following steps can be applied:

- Adding standard fields to copies of each designation dataset to identify the constraint type and the action required by the developer;

- Performing a 'union' process to join datasets and all existing attributes (this process will create additional polygons where designations/assets intersect);

- Quality assurance;

    - checking intersections and ensuring that designation information is recorded at the correct level;
    (*e.g. where an asset is a Scheduled Monument/Archaeological Area or Listed Building within a Conservation Area, the Scheduling or Listing should take precedence. If the same asset is both Scheduled and Listed, the Scheduling should take precedence)*;

- Merging any separate polygons which form part of a single asset;

- Partners may wish to make exceptions and screen out assets in line with the character of the local historic environment – for instance, where there are large numbers of listed churches still in ecclesiastical use (where relevant exemptions apply).

3.27   This process will result in a dataset with large amounts of attribute data, derived from the component datasets, which may be rationalised as indicated below.

Alerts mapping

3.28   The key requirement for NPPF-compliant alerts data is screening out HER records that do not relate to **assets** within the meaning of the NPPF. However, events and other records that are unrelated to assets contribute to our understanding of the historic environment, and are potentially useful in developing separate layers depicting historic environment/archaeological potential.

Available data

3.29   The principal sources of data for alerts mapping will be non-statutory designation datasets (Registered Parks and Gardens, Battlefields and World Heritage Sites) obtained from the English Heritage website, the asset data held by the HER and any local lists in place.

Additional sources

3.30   HERs could also consider limited inclusion of Historic Landscape Characterisation (HLC) data where this relates to a locally important class of asset, particularly where they may be under-represented (or not recorded) in the HER database. (For example, historic parks, gardens and designed landscapes are frequently under-recorded, with the Register of Parks and Gardens covering only a fraction of the resource.)

3.31   Where HERs have undertaken mapping of key structured views from important assets – conducted in line with a robust methodology – this may also be included in the alerts layer.

Processes
Datasets

3.32   The core alerts data will be derived from the HER database relating to recognised historic environment assets and national datasets relating to non-statutory designations.

Audit

3.33   Data held in the HER database and linked to the full HER GIS dataset is likely to incorporate a range of records that should not form part of the alerts dataset.

3.34   To be included in the dataset, records must relate to heritage assets within the meaning of the NPPF – therefore the key requirement is the existence of positively identified significance meriting consideration in planning decisions.

3.35   HERs are therefore advised to screen out:

- Events records (unless these are the sole representation of a recognised *and surviving* asset)
- Find-spot / Portable Antiquities Scheme records (unless they are the sole representation of a recognised and surviving asset)
- Records with poor positional accuracy[4]
- Any other records that may be of questionable provenance or significance
- Records with no spatial data

3.36   There may be scope for HERs to add fields to their central database to enable blanket attribution of 'asset' status to qualifying records. This would facilitate rapid and consistent production of future alerts mapping without the need to resort to detailed queries every time.

Concordance

3.37   Assuming that HER data is held as polygons, assimilating non-statutory designation datasets should be a simple process – indeed, many HERs already undertake such processes as a matter of course. Where point data is still partly employed, a process of quality assurance and data cleaning will be required to either: digitise accurate extent polygons, or apply appropriate buffers to records generated at suitably high resolution to cover the entirety of the asset. For lower resolution data, alternate methods should be employed. Further guidance is available in the current version of [Informing the Future of the Past](#).

Example:
Where an asset is recorded as a point to 100m resolution (i.e. with a six-figure NGR), a circular buffer generated around the point would need a radius of 141.42m to be sure to cover the asset – generating a polygon far larger than necessary. Equally, if such points were included in a general 'buffering' exercise for all point data (e.g. to achieve a minimum polygon radius for SHINE candidate status), it is likely that such sites would not be adequately protected – as illustrated below.
Where there is no realistic potential to improve positional accuracy (e.g. from rectification of aerial photography or confirmation on the ground) HERs should consider depicting such records as extent squares for clarity.
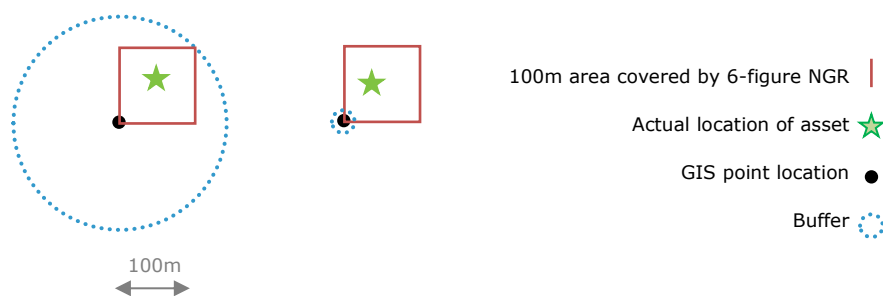

100m area covered by 6-figure NGR	|
Actual location of asset	☆
GIS point location	●
Buffer	⦙

Figure 3.1: issues with buffering lower-resolution point data

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3.38   Depending on the numbers of records involved, this process could be undertaken through the HER database and integrated GIS, or directly in the corporate GIS. Differing scales of data capture and intended viewing resolution of constituent polygons will necessitate a 'health warning' on data to ensure users are aware of the limitations.

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[4] E.g. 'buffer' polygons created from point-based site records with a resolution less than or equal to a six-figure National Grid reference (see Figure 3.1)

3.39   The datasets should be combined to retain the full extent and all attributes of features, and then rationalised as outlined below.

Interpret and Simplify

3.40   It is likely that the intersection of multiple polygon datasets will result in overlap between assets. To provide clarity, there may be scope to combine polygons in a range of instances, for example where they:

- are multiple parts of a single asset;

- relate to separate parts of a coherent group of assets (e.g. a barrow cemetery, or outlying features within a designed landscape);

- relate to assets of significant complexity (e.g. multi-period cropmarks);

- are so closely spaced as to make the potential for impacts on individual assets unclear; or,

- relate to an asset and clearly-defined components of its setting (i.e. structured views).

3.41   This process of interpretation and simplification requires the expert input of HER and curatorial staff, but has considerable potential to improve usability of the data. Many partners currently undertake similar processes to ensure the information they provide is accessible and fit for purpose.

3.42   Where alerts and constraints data intersect, although the relevant regulatory constraints should take precedence, HERs should avoid 'clipping' out the constraints polygon from the alert polygon. This ensures that, where development proposals intersect both constraints and alerts data (and therefore designated and undesignated assets), the impacts on both are considered. HERs should give consideration to a precautionary approach that reflects the likely higher degree of significance afforded to undesignated components of designated complexes. In such circumstances, triggering additional consultations to English Heritage is preferable to potentially significant impacts occurring.

3.43   How datasets are simplified will depend partly on the local character and significance of the historic environment and partly on the specifications required and agreed by LPAs.

Dealing with significance

3.44   Broadly, it should not be necessary to ascribe levels of significance to assets within the 'alerts' dataset.

3.45   By definition, to be included they must embody a level of historic environment significance which necessitates consideration in planning decisions. The NPPF places the responsibility for describing significance on the developer (Para. 128), and on the LPA in relation to identifying and assessing the ways in which this is likely to be affected by proposed development (Para. 129). The function of alerts mapping is therefore to highlight the presence of said significance and to trigger the appropriate level of consultation and assessment to adequately understand the likely impact of proposed development.

3.46   However, where HERs and LPAs agree that information on significance is a useful addition to the dataset, this guidance should not act as a barrier. Indeed, there may be considerable justification, particularly where internationally significant assets cannot meet the legislative requirements for designation.

4
Integration

4   Integration

4.1   Building accurate, accessible historic environment information into key stages of the planning process should be a priority. This provides LPAs an opportunity to shape how the historic environment contributes to sustainable development, and ensures developers are aware of the opportunities and responsibilities of building in sensitive areas.

4.2   Alerts and constraints maps are a spatial expression of planning policy, and are therefore only as useful as the framework they support.

The evidence base

4.3   Ideally, alerts and constraints maps should be developed in parallel with the collation and study of the historic environment evidence base for Local Plans. This can help to streamline workloads, reduce duplication of effort and ensure the best possible integration with local policy. However, it is recognised that not all LPAs are currently at this stage of plan development and review.

4.4   Where LPAs use this opportunity to explore the potential for local designation, or review of existing Conservation Areas (and associated Article 4 Directions), there is a chance for HERs to perform an important role in facilitating information exchange. Historic environment potential maps could usefully be developed at this stage (as per paragraph 169 of the NPPF) to inform any necessary changes to policy where significant sensitivities exist.

Local planning

4.5   Ensuring that policy frameworks reflect current knowledge of the character and significance of the local historic environment is critical in ensuring appropriate protection and delivering necessary enhancements.

4.6   While local plan policies should be consistent with the NPPF, where the evidence base highlights a potential gap in the NPPF policies, LPAs should consider how best to reflect this in policy or supporting text.

4.7   Where robust alerts and constraints maps are in place, supporting text should refer developers to these resources where publicly accessible, and to the relevant HER and to the curatorial archaeology service / conservation officers for appropriate advice.

Proposals maps

4.8   'Constraints' and non-statutory designations have traditionally been depicted on local plan / LDF proposals maps. It is anticipated that this will continue as standard practice to highlight the importance of such features. Conversely, incorporating the full 'alerts' dataset is unlikely to be a proportionate or useful approach. Where partners have identified areas with concentrations of known assets and high historic environment potential, these areas could usefully be added to detailed maps to highlight the sensitivity of these areas and to invoke the appropriate policies.

Neighbourhood planning

4.9   The Localism Act 2011 confers significant responsibilities on local planning authorities to support communities – through parish councils, town councils or neighbourhood forums – in developing new Neighbourhood Plans. The level of importance placed on heritage issues by communities may vary significantly, however ensuring that plan-making bodies[5] have easy access to information is vital in facilitating the process.

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[5] Neighbourhood plans may be prepared by Town Councils, Parish Councils or 'neighbourhood forums' established by local people and organisations

4.10   English Heritage will not always be able to provide detailed commentary on individual community-led plans. LPAs and HERs are likely to be called upon to deliver feedback on the heritage content of plans and provide guidance on sourcing and interpreting relevant information.

English Heritage has produced advice for organisations undertaking the community-led planning process. '**Knowing Your Place**' complements and adds detail to the community planning toolkit provided by Action with Communities in Rural England, available at **www.acre.org.uk**

Further help and tools to support neighbourhood planning can be found at '**Placecheck**' and '**Protect our Place**' – both initiatives are supported by EH.

It should be noted that heritage is a key issue and opportunity in urban as well as rural England, and should be taken into account in all community-led plans in line with EH advice.

Alerts and constraints maps can readily be transposed to the community level, providing additional detail to developers where required.

Development Management

4.11   Alerts and constraints mapping can add the most value through the development management process, promoting early awareness of sensitivities and highlighting the need for early and meaningful engagement.

Pre-application discussions

4.12   'Front-loading' the development management process is a key aspiration of the reformed planning system. Making alerts and constraints mapping – along with other planning information – available online provides an excellent means of triggering appropriate consultation and highlighting potential sensitivities at the earliest opportunity.

4.13   The presence of, or potential for, heritage assets on development sites can introduce a significant element of uncertainty and the prospect of substantial costs for necessary research and assessment work. In line with the approach to Development Management set out in the NPPF, LPAs and developers alike should adopt a proactive approach to the development process. This can improve the flow of information and lead to better quality applications – securing higher quality development and better outcomes for the historic environment.

Validation

4.14   When planning applications are first submitted to LPAs, the validation stage offers an important opportunity to review applications against alerts and constraints data and make developers aware of potential sensitivities in good time. Therefore ensuring that alerts and constraints data is available through development management / land charges IT systems is fundamental to taking advantage of this opportunity.

4.15   LPAs should have published lists of Local Information requirements for planning applications[6], outlining the supporting information they expect to accompany different types of application to which developers can be referred.

4.16   LPAs **should not validate** applications where the extent of impact of the proposal on the significance of any heritage assets affected cannot adequately be understood from the application and supporting documents. It is therefore incumbent on LPAs, particularly in areas where the historic environment is a frequent issue, to ensure that validating officers receive appropriate training to be able to:

- Using appropriate alerts and constraints mapping, screen out and invalidate applications affecting heritage assets that are not accompanied by any relevant assessments or supporting information

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[6] As per DCLG Development Management Policy Annex on information requirements and validation (2010)

- Recognise the need for applicants (and the LPA) to seek appropriate information and advice – and make contact with applicants to make them aware of the situation prior to issuing an official written notice of invalidity

4.17   This approach ensures that delays are minimised and that, once the appropriate information is submitted, validated applications can be passed to the relevant consultees and progress smoothly to determination – contributing to certainty for developers, and efficiency for LPAs.

Outline planning permission

4.18   Where applications or enquiries come forward regarding outline planning permission within 'alert' areas, LPAs should consider whether it will be feasible to accurately gauge the likely impacts of the development on the character and significance of the assets in question. While further applications for reserved matters – potentially including the assessment of impacts on the historic environment – will routinely be required, LPA should consider invoking their right under Article 4(2) of The Town and Country Planning (Development Management Procedure) (England) Order 2010. This enables LPAs to notify applicants that they are unable to determine their application unless further details are submitted.

4.19   Within 'constraints' areas, the situation is different due to additional regulatory requirements. There is no provision for 'outline' Listed Building or Scheduled Monument Consent; therefore full applications will be required to fulfil the requirements of these processes. Outline applications in Conservation Areas may be unlikely to provide sufficient detail to determine the effect of the proposal on the character of the area.

Assessment

4.20   As noted above, the function of alerts and constraints mapping is principally process-related, rather than to provide detailed information or interpretation of the significance of the historic environment. They provide a valuable first step in the process – identifying the presence of historic environment significance and the need for consultation and assessment. However, their function is to define a course of action and to signpost sources of information and advice, rather than to provide any interpretation.

4.21   Their role in the assessment of impacts should therefore be limited to providing a baseline picture of the nature of the historic environment against which to define a proportionate response.

Determinations

4.22   While it is not expected that alerts and constraints mapping in themselves will play a significant role in determining planning applications, the courses of action they define – and how developers choose to respond – have the potential to make a substantial contribution.

4.23   Where proposed developments fall within constraints or alerts polygons, a level of assessment proportionate to the significance of the asset(s) and the nature and scale of the impact should accompany any application for planning permission.

Planning conditions and obligations

4.24   Where proposals fall within alerts and constraints areas, developers should be aware of the possibility that, where planning permission and other relevant consent is granted, it is likely to be subject to conditions to safeguard the historic environment interest. However, it is not possible for mapping products to provide any certainty in this regard.

Planning appeals

4.25   Users should be made aware that data, regardless of frequency of updates, cannot be guaranteed and that mapping is provided for information only with the express purpose of ensuring that developers seek appropriate advice.

LPAs and HERs, where alerts and constraints data is made available to the public, should take care to apply a suitable disclaimer to this effect to ensure that this information cannot be used against them in appeals.

Example disclaimer

"I understand that the data provided on this site are intended for information only; that professional advice should be sought from relevant bodies at the earliest opportunity of when planning proposed development or land management changes, or any other activity that could potentially damage a heritage asset.

This information requires professional skills to properly interpret it, including understanding its limitations, and to identify the needs and sensitivities of the known heritage assets and areas of historic environment potential.

I understand that I may also require permissions in advance of undertaking any works.

I understand that all datasets are subject to frequent revision. [Insert name of Council] *will have no liability in respect of any error, inaccuracy or omission in information provided on this website, or in respect of any costs, expenses or losses incurred by reason of any such error, inaccuracy or omission."*

4.26   Partners may also be well advised to provide general disclaimers on the limitations of the data – for example, intimating that SM data is an interpretation of information depicted on the original legal documents – to make users aware of the need for appropriate consultation.

Appendix 1
Suggested attribute information for datasets

HERs and LPAs should consider the level of appropriate detail to retain in the attribute table of the Constraints dataset. It may be desirable to provide LPAs with a more detailed dataset for internal use, and a streamlined version to be made available through e-Planning systems.

4.28   **Error! Reference source not found.** Table A.1 below indicates the recommended maximum level of attribute detail. Much of this is derived from the constituent datasets, or can be quickly generated through easy queries and adding attributes to multiple records.

Table A.1: Constraints – possible attributes

Constraints field code	Explanation
C_UID	Unique identifier
Con_type	Constraint type (LBI, LB2*, LB2, SM, CA, PW)
Descriptor	Thesaurus description / address / name of CA or wreck
Action	Required action by developer e.g.: "Application for Listed Building Consent required – consult XXX / Heritage Statement required in support of application"
LB_UID	Listed Building ID number (from LB dataset)
MONUMENT_N	Scheduled Monument ID number (from SM dataset)
CA_UID	Conservation Area ID number (if exists)
SI_NUMBER	Statutory Instrument number (from Protected Wrecks dataset)
HER_ID	Historic Environment Record identifier (multiple fields may be required where information from more than one HER, or more than one spatial database, is used)
OS_TOID	OS MasterMap Identifier (for Listed Building records)
CAPTURE_SC	Scale at which polygon was captured
X	Easting (polygon centroid – can be automatically generated)
Y	Northing (polygon centroid – can be automatically generated)
WebURL	Hyperlink to online HER / Heritage Gateway information / Conservation Area Appraisal documents or relevant SPG
LastEdit	Date/time of last modification. ISO 8601 extended format should be used (i.e. YYYY-MM-DD HH:MM:SS)

The attribute list outlined in Table A.2below should be regarded as the recommended basis for the dataset, with fields potentially being added or removed to suit the target audience.

Table A.2: Alerts – possible attributes

Alerts map field code	Explanation
A_UID	Unique identifier
Type	Alert type: Asset / Setting / Potential
Descriptor	Thesaurus description
Action	Required action by developer e.g.: "Consult Local Authority Historic Environment Service / Heritage Statement required in support of applications" *Could include hyperlinks to HE service website/contact details*
HER_ID	Historic Environment Record identifier
PG_U_ID	Parks and Gardens identifier (from national Registered Parks and Gardens dataset)
BF_U_ID	Battlefield identifier (from national Battlefields dataset)
Rel_ID	HER ID number(s) of related assets (particularly for setting alerts)
X	Easting (polygon centroid – can be automatically generated)
Y	Northing (polygon centroid – can be automatically generated)
WebURL	Hyperlink to online HER / Heritage Gateway information
LastEdit	Date/time of last modification. ISO 8601 extended format should be used (i.e. YYYY-MM-DD HH:MM:SS)