



Historic England

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Planning Policy
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Our ref: PL00797117

Your ref:

Telephone

15 January 2025

Dear Planning Policy Team

Luton Local Plan Call for Sites – December 2024

Thank you for consulting Historic England on your Call for Sites for your Local Plan. As the government's adviser on the historic environment, we are responding as a statutory consultee for local plans.

Whilst Historic England does not advocate particular sites, we can provide advice on how to take account of the historic environment as you evaluate submissions and sites brought forward from elsewhere.

We have produced a number of detailed Good Practice Advice and Advice Note documents. We recommend that you review the following as part of your call for sites process:

[The Historic Environment in Local Plan - Good Practice Advice in Planning 1](#)

[The Setting of Heritage Assets - Good Practice Advice in Planning 3](#)

[The Historic Environment and Site Allocations and Local Plans - Advice Note 3](#)

Site Allocations

Historic England advocates a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are

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locally valued and important, as well as the landscape and townscape components of the historic environment.

The importance and extent of below ground archaeology is often unknown, although information in the Historic Environment Record (HER) will indicate areas of known interest, or high potential where further assessment is required before decisions or allocations are made. Conservation and archaeology staff within the relevant councils should be consulted on matters relating to archaeology, landscape/townscape and the historic environment generally.

Assessing sites

Our [The Historic Environment and Site Allocations and Local Plans - Advice Note 3](#) sets out a suggested approach to assessing sites and their impact on heritage assets, sometimes referred to as Heritage Impact Assessment. It advocates a number of steps, including understanding what contribution a site, in its current form, makes to the significance of the heritage asset/s, and identifying what impact the allocation might have on significance. This could be applied to the assessment and selecting of sites within a plan.

In essence, it is important that you:

- a) Identify any heritage assets that may be affected by the potential site allocation.
- b) Understand what contribution the site makes to the significance of the asset
- c) Identify what impact the allocation might have on that significance
- d) Consider maximising enhancements and avoiding harm
- e) Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness.

In assessing sites, it is important to identify those sites which are inappropriate for development and also to assess the potential capacity of the site in the light of any historic environment (and other) factors. This should be more than a distance-based criteria, but rather a more holistic process, which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge is not appropriate. Our advice on [Managing Significance in Decision-Taking in the Historic Environment](#) might be helpful here, as might [The Setting of Heritage Assets - Good Practice Advice in Planning 3](#)

If a site is allocated, we would expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting, the need for high quality design and any other factors relevant to the historic



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environment and the site in question. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and for tackling heritage at risk.

Paragraph 16 of the National Planning Policy Framework requires Local Plans to 'contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'.

Planning Practice Guidance states, 'Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development' (PPG Paragraph: 022 Reference ID: 61-022-20190315 Revision date: 15 03 2019). Protection and enhancement of the historic environment is part of the environment objective of the planning system (Paragraph 8 of the NPPF) and Local Plans should set out a positive strategy in this respect (Paragraph 203 of the NPPF).

Concluding thoughts

In preparation of the forthcoming local plan, we encourage you to draw on the knowledge of local authority conservation officers and archaeologists as well as local heritage groups.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

Yours sincerely

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