



Historic England

Consultation on additional flexibilities to support housing delivery, the agricultural sector, businesses, high streets and open prisons; and a call for evidence on nature-based solutions, farm efficiency projects and diversification

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport. We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

We welcome the opportunity to submit a response to this consultation on changes to permitted development rights.

Key feedback

Historic England supports a plan-led planning system. The plan-led system enables local authorities to create sustainable places and communities to engage with the planning system in their local area.

We recognise the role that Permitted Development Rights (PDRs) can play in allowing small scale changes, which would ordinarily be permitted, without the need for a full planning application. However, we are concerned that the increase in the number and scope of PDRs, along with incremental changes to existing PDRs, has the potential to undermine the plan-led system. It also has the potential to complicate, rather than simplify, the planning system.

We are equally concerned that some PDRs do not allow for the full consideration of the impacts of some development on the historic environment. We therefore see merit in the Levelling Up, Housing and Communities Select Committee's call¹ for a full review of PDRs and their role within the wider planning system.

Our overriding concerns in relation to this consultation relate to the proposals to extend certain PDRs to article 2(3) land: this risks a significant reduction in heritage protection in those areas. There is a very real and serious concern as to the impact of these proposals on conservation areas and the cultural heritage in National Parks, Areas of Outstanding Natural Beauty (AONBs) and the Broads. We welcome the exclusion of World Heritage Sites from the proposed changes.

The National Planning Policy Framework (NPPF) defines conservation areas as designated heritage assets, requiring that great weight is to be given to their conservation (paragraph

¹ Levelling Up, Housing and Communities Committee, 2023. [Permitted Development Rights Third Report of Session 2021–22](#).

199). The NPPF also gives great weight to the landscape and scenic beauty in National Parks, the Broads and AONBs. It highlights cultural heritage as an important consideration in these areas, which should be given great weight in National Parks and the Broads (paragraph 176). Furthermore, in the exercise of planning functions, local authorities must pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas, under s72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. We are concerned that the proposed changes to PDRs could run counter to these requirements.

We support the continued use of agricultural buildings and, where appropriate, their adaptive re-use, if managed properly. However, agricultural buildings can make important contributions to the historic significance of protected landscapes classified as article 2(3) land. It is therefore important to understand the character of those landscapes, and of the sites, farmsteads and buildings within them before making decisions on change of use. To help with this, there is a wide range of Historic England [guidance](#) on farm buildings and traditional farmsteads. The impacts of such change are often significant and are therefore best managed through the planning application process which fully engages national legislation and the heritage and design policies of the NPPF.

Consultation questions and responses

Design codes

Q.1 Do you agree that prior approvals for design or external appearance in existing permitted development rights should be replaced by consideration of design codes where they are in place locally?

No.

The idea of widespread use of design codes has been introduced very recently. Provided that they are anchored in a robust understanding of the local context, design codes should reinforce the historic character and local distinctiveness of places. However, at this stage the precise role and effectiveness of design codes is largely untested.

According to paragraph 128 of the NPPF, they are intended 'to provide maximum clarity about design expectations at an early stage'. We would therefore expect that any applicable local design code would be a key consideration in relation to permitted development cases where prior approval is required. However, the NPPF goes on to state that their geographical coverage, level of detail and degree of prescription will vary between places and should allow a degree of variety. The applicability of a local design code to a particular site and context will therefore be highly variable, meaning that simple substitution of a design code for prior approval is unlikely to be practical or effective. Rather, prior approval and design codes should be seen as complementary.

In addition to this, even in areas where there is relative uniformity in the form and character of development, and where a detailed design code is in place, heritage assets (whether designated or non-designated) are frequently distinguished by their uniqueness. The retention of prior approval is necessary to allow for specific local circumstances such as the

presence of a historic building (and impacts on that building or its setting) to be taken into account.

Consequently, we support the retention of prior approval for design or external appearance in those instances where they are in place. We agree that there is scope for reducing uncertainty around prior approval matters (paragraph 14 of the consultation document) and would recommend a review of all prior approval matters across all PDRs – we would be happy to assist with any such review. This should include a review of prior approval matters in place, and consideration of where additional prior approval matters should be included. This review should be based upon an understanding of the potential impacts from each PDR and a consideration of evidence of actual impacts from each existing PDR. Consideration should be given to whether prior approval is an appropriate mechanism to manage impacts from particular PDRs and, where it is not, whether those rights should be withdrawn, or additional limitations/exclusions introduced.

Q.2 Do you think that any of the proposed changes to permitted development rights in relation to design codes could impact on: a) businesses b) local planning authorities c) communities?

Yes. The proposed changes would reduce the ability of local planning authorities (LPAs) to manage change in a way that responds to specific local circumstances. This has the potential to impact negatively on the quality of places and local environments, which will ultimately impact on local communities.

It is also possible that devising a process to check the adherence of a scheme to a design code would be more onerous for LPAs than the current process of considering a case for prior approval.

Supporting housing delivery through change of use permitted development rights

Commercial Business and Service uses to dwellinghouses (Class MA of Part 3)

Q.3 Do you agree that the permitted development right for the change of use from the Commercial, Business and Service use class (Use Class E) to residential (Class MA of Part 3), should be amended to either:

- a) Double the floorspace that can change use to 3,000 square metres**
- b) Remove the limit on the amount of floorspace that can change use**
- c) No change**
- d) Don't know**

These changes to permitted development were only recently introduced and there has been limited opportunity to understand their implications for the historic environment.

The proposal to allow more commercial floorspace to be converted to residential use without planning permission will further dilute the ability of planning authorities to:

- Pursue a plan-led approach to development, which takes account of place-shaping objectives, the character of an area and its historic interest.
- Manage town centres effectively and maintain economic coherence and vitality.
- Take account of the views of local communities on these large-scale proposals.

It is important to understand whether such change of use under PDR would take place in response to commercial failure or be driven by the market drivers associated with higher value residential uses. If residential market value drives change of use, this could accelerate the demise of the traditional town, or village, centre.

Where possible, change of use from Class E to residential uses for the upper floors only (above shops and other commercial premises) would be preferable. This is consistent with aspirations to see underused buildings brought back into full use and to see town centres re-occupied, both to support their vitality and ensure inward investment into existing building stock.

Vacancy requirement

Q.4 Do you agree that the permitted development right (Class MA of Part 3) should be amended to remove the requirement that the premises must be vacant for at least three continuous months immediately prior to the date of the application for prior approval?

No. The vacancy requirement helps to ensure that commercial uses prevail where there is a demand for them. It would be preferable that measures are put in place to ensure that this PDR cannot be mis-used by allowing buildings to fall into disuse unnecessarily, to justify their change of use under this PDR. Once commercial and mixed areas have been lost to residential use, it is unlikely that this change will be reversed.

Removing this requirement will potentially encourage displacement of business to the detriment of both urban and rural places and communities. It has the potential to adversely affect historic high streets and undermine government investment and support for such areas.

Article 2(3) land

Q.5 Do you think that the permitted development right (Class MA of Part 3) should apply in other excluded article 2(3) land?

No. Paragraph 176 of the NPPF requires that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONBS, which have the highest status of protection in relation to these issues. The NPPF goes on to say that conservation and enhancement of wildlife and cultural heritage are important considerations in these areas, and should be given great weight in National Parks and the Broads.

We do not support the extension of PDRs in these areas. Even in those cases where change of use does not involve physical change, residential use will commonly be associated with a need for outdoor amenity space and car parking. In combination with the loss of a

sustainable mix of uses, this can impact on the character and vitality of a rural or historic place, such as a village or high street. It would be best that these matters are controlled through the normal planning application process.

Whilst declining population levels can impact on the viability of local services and businesses in rural communities, so the loss of local businesses can impact on the vitality and viability of local communities. Removing the need for planning permission for such changes of use in National Parks, the Broads and AONBs will allow for the loss of local businesses in an unplanned manner, to the detriment of local communities. This in turn may harm the viability, vitality and sustainability of historic towns and villages in protected areas.

The consultation document highlights the benefits of local populations in supporting community hubs and local businesses, and we would recommend that consideration be given to supporting residents in rural and coastal areas in other ways. This could be done through other mechanisms (such as managing loss of residential units to second homes and short term lets), rather than enabling the unmanaged conversion of existing business premises to residential.

We welcome the indication at paragraph 28 of the consultation document that there is no proposal to extend this permitted development right to World Heritage Sites. Extending this PDR to World Heritage Sites would potentially impact on their Outstanding Universal Value, and be contrary to the [UNESCO 1972 Convention Concerning the Protection of the World Cultural and Natural Heritage](#). It may also be in conflict with any World Heritage Site Management Plans in place for individual Sites.

Prior approval – conservation areas

Q.6 Do you think the prior approval that allows for the local consideration of the impacts of the change of use of the ground floor in conservation areas on the character or sustainability of the conservation is working well in practice?

Yes. Department for Levelling Up, Housing and Communities live planning data indicates that between October 2021 and June 2023 2,315 applications were made for change of use to residential within this PDR. Of these, 1,998 applications were deemed necessary to apply for prior approval, of which 1,175 were permitted. This indicates that LPAs felt it necessary to refuse prior consent for 41% of these applications, suggesting a high need for this process.

Whilst we have not been able to undertake detailed a statistical analysis of reasons for refusal, rapid assessment of cases suggests some themes in the use of the prior approval notification process. We have seen that a high number of cases involve identification of the effects of an article 4 direction covering the area affected which, therefore requires a full planning application for the proposals.

In the notifications by the Chief Planning Officer on behalf of the Secretary of State to several LPAs (12 September 2023) setting out the modifications they had decided to make to areas covered by article 4 directions, the justification is explicit that the prior approval process provides the necessary safeguard for the character or appearance of conservation areas.

Furthermore, without the prior approval process, there is potential that a change of use of a building, including the ground floor, in a conservation area would result in that building

receiving the PD rights of Use Class C3, which are more extensive (such as changes to fenestration). The use of these PDRs without consideration, could be detrimental to the area's character or appearance.

We have noted that several decisions for approval have been justified on the basis of change of use not resulting in change of appearance. This fails to take into account the effect of the PDRs received by the building once it is classed as in Use Class C3 and is an unintended outcome that should be addressed.

The prior approval mechanism also provides opportunity to consider the impact of change of use on the character of the conservation area, which includes the variety of uses. This is particularly important in town centre conservation areas, where, as the High Streets Task Force have demonstrated through their research, providing a high level of footfall and retail offer are the two most important factors in the continued vitality of high streets.² Whilst residential uses, particularly above ground floor level, may be a desirable part of a mixture of uses in town centres, there is potential that the market value of residential uses pushes out other uses, resulting in detrimental changes in footfall and vitality in historic commercial areas, protected as conservation areas. As such the current prior approval mechanism plays an important role in protecting character of areas, and the vitality of high streets as well as their appearance and we urge its retention.

Hotels, boarding houses and guest houses (Use Class C1) to dwellinghouses

Q.7 Do you agree that permitted development rights should support the change of use of hotels, boarding houses or guest houses (Use Class C1) to dwellinghouses?

No. Hotels, boarding houses, etc., are often historic buildings that contribute to an area's sense of place, particularly in historic seaside and spa towns that developed around the tourist trade. Many are also associated with historic public houses, a class of building experiencing large decline.

Hotels, and similar, are also economically important often acting as a barometer for the tourist industry of an area, reflecting the demand from business users during the week and from leisure users at weekends. Given this, unregulated change of use risks adversely impacting both the historic character of places and their economic vitality, including the opportunity for heritage-led regeneration.³

An unintended consequence of this proposal would be to exacerbate the issue of short-term lets reducing the amount of housing available. As such, this proposal appears to undermine the recent government attempts to control the loss of homes to short term lets by diverting pressure to that market.

² High Streets Task-Force, 2019, High Streets Task Force - Frameworks for high street and town centre action and renewal, [accessed online <https://www.highstreettaskforce.org.uk/news/high-streets-task-force-frameworks-for-high-street-and-town-centre-action-and-renewal/>]

³ For examples of heritage led regeneration in historic seaside towns please see: <https://historicengland.org.uk/research/current/discover-and-understand/coastal-and-marine/seaside-resorts/>

This proposal would also undermine the ability of local authorities to plan effectively, both in relation to the economy and housing, as well as in responding to issues such local over, or under, supply of hotel accommodation.

Q.8 Are there any safeguards or specific matters that should be considered if the change of use of hotels, boarding houses or guest houses (Use Class C1) to dwellinghouses was supported through permitted development rights?

We do not support this proposal but, if implemented, we agree (consultation document paragraph 34) that specific safeguards and considerations are needed through the prior approval process. These should allow for consideration of the impacts the change of use could have on the local tourism economy; however, it should also consider the heritage significance of the buildings in question and their contribution to the significance of other heritage assets, including conservation areas.

As per the consultation it is important that homes created under the right would be limited to use as a C3 dwellinghouse and would not benefit from PDRs to change use to a small House in Multiple Occupation, or to the proposed use class for short term lets.

Q.9 Do you think that any of the proposed changes in relation to the Class MA permitted development right could impact on: a) businesses b) local planning authorities c) communities?

Yes. In relation to impacts to businesses, please see our responses to questions 6, 7 and 8, which highlight the risk of negative consequences of this proposal to the local economy, high streets and tourism. We should also highlight that as many shops and commercial premises are historic buildings, this in turn could have unintended negative consequences for historic buildings should the businesses that occupy them decline and/or fold. Fragmentation of commercial frontages in town centres is likely to result in loss of vitality for commercial areas, which may have impacts for businesses in the surrounding area. Whilst it may be desirable for some retail areas to shrink, becoming more focused and to introduce residential use to increase footfall in town centres, this needs careful management to avoid the unintended consequence of making continued commercial/retail use unviable due to competing residential land value, with negative impacts for the character or appearance of historic places.

The proposal would undermine the ability of LPAs to plan effectively plan for sustainable places and will allow for potentially significant change of use and transformation of communities without any community engagement taking place.

Article 2(3) land

Q.16 Do you think that the permitted development right for the change of use from hot food takeaways, betting offices, pay day loan shops and launderette (Class M of Part 3) should apply in other article 2(3) land?

Q.17 Do you think that the permitted development right for the change of use of amusement arcade or centre, or casino (Class N of Part 3) should apply in other excluded article 2(3) land?

No. Please see our answer to Q.5 for reasoning.

It would be best that these matters are controlled through the normal planning application process.

We welcome the indication at paragraph 43 of the consultation document that there is no proposal to extend this permitted development right to World Heritage Sites.

Agricultural buildings to dwellinghouses (Class Q of Part 3)

Size limits and maximum numbers of homes delivered

Q.26 Do you agree that an overall limit on the amount of floorspace that can change use, set at 1,000 square metres, should be introduced for the agricultural buildings to dwellinghouses right (Class Q of Part 3)?

We have overall concerns regarding the impacts of change of use of agricultural buildings under Class Q, and recommend that it is reviewed to assess its potential, and actual impacts on the historic environment. If it remains in place, we recommend that a lower limit (below 1,000 square metres) is introduced.

Rear extensions

Q.28 Do you agree that the permitted development right for the change of use from agricultural buildings to residential use (Class Q of Part 3) should be amended to allow for an extension to be erected as part of the change of use on previously developed land?

No. While we support the sensitive, adaptive reuse of redundant traditional farm buildings where appropriate, any extension(s) should respect the setting and significance of such buildings and their sensitivity to and capacity for change. It is appropriate therefore that these matters continue to be considered via the normal planning process. Locally produced design guides may be beneficial to ensure that any extensions are appropriate to local context.

Q.29 Do you agree that a prior approval be introduced, allowing for the consideration of the impacts of an extension on the amenity of neighbouring premises, including overlooking, privacy and light?

We do not support the amendment of this permitted development right to allow for extensions to existing buildings (see answer to question 28). However, if it was to be amended, prior approval should be introduced for consideration of design, external appearance, heritage and archaeological matters.

Article 2(3) land

Q.31 Do you think that the permitted development right for the change of use from agricultural buildings to residential use (Part 3 Class Q) should be amended to apply in other article 2(3) land?

No. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues (NPPF, paragraph 176). The NPPF goes on to say that conservation and enhancement of wildlife and cultural heritage are important considerations in these areas and should be given great weight in National Parks and the Broads.

Agricultural buildings, often in rural landscapes, is an important component of the cultural heritage of those protected landscapes and extending this PDR to article 2(3) land will undermine their conservation. We do not support the extension of PDRs in these areas. Even in those cases where change of use does not involve physical change, residential use will commonly be associated with a need for outdoor amenity space and car parking which, in combination with the loss of a sustainable mix of uses, can impact on the character and vitality of a rural or historic place, such as a village or high street. The need for a planning application does not mean that change should not be allowed in all cases, but that change can be managed through the normal planning application process.

We recognise there may be a need for new homes within some protected landscapes, and the need to use existing building stock effectively. We support the adaptive reuse of redundant traditional farm buildings in an appropriate manner but the starting point for this should be a thorough consideration of the significance of such buildings and their location in relation to sensitivity to and capacity for change. To help with this, there is a wide range of Historic England [guidance](#) on farm buildings and traditional farmsteads.

This is always the case, but especially so within protected landscapes. National Parks have a statutory duty “To conserve and enhance the natural beauty, wildlife and cultural heritage” and that these and AONBs will also be subject to adopted local plans, with which such changes could be in conflict. To carefully balance these demands alongside other considerations, we consider that the normal planning process is the most appropriate route rather than permitted development.

Aside from being important cultural landscapes they also contain significant numbers of designated heritage assets. For example, National Parks and AONBs contain 66,000 listed buildings, 9,000 scheduled monuments (nearly half the total number in England) and in

excess of 360 historic registered parks and gardens¹. In addition to seeking to preserve or enhance their natural beauty and wildlife, there is a specific legal duty to preserve or enhance the cultural heritage of a National Park.

Historic England would therefore welcome retaining exclusions to include article 2(3) land. This means that impacts on designated landscapes and heritage assets such as conservation areas could be properly considered through the submission of a planning application.

We welcome the indication at paragraph 76 of the consultation document that there is no proposal to extend this permitted development right to World Heritage Sites. Extending this PDR to World Heritage Sites would potentially impact on their Outstanding Universal Value, and be contrary to the [UNESCO 1972 Convention Concerning the Protection of the World Cultural and Natural Heritage](#). It may also be in conflict with any World Heritage Site Management Plans in place for individual Sites.

Highways access

Q.36 Do you agree that any existing building must already have an existing suitable access to a public highway to benefit from the right?

Yes. New, or amended, access to public highways can have a significant impact on the character of historic buildings, farmsteads or places. It should therefore be considered under the planning application process.

Supporting the agricultural sector through additional flexibilities

Agricultural development on units of 5 hectares or more (Class A of Part 6)

Q.52 Do you agree that we remove the flexibility for extensions and the erection of new buildings where there is a designated scheduled monument?

Yes. Historic England welcomes the removal of this flexibility in relation to scheduled monuments. It will better protect these nationally important designated sites and reduce conflict within the planning system.

Agricultural development on units of less than 5 hectares (Class B or Part 6)

Q.55 Do you agree that we remove the flexibility for extensions where there is a designated scheduled monument?

Yes. Historic England welcomes the removal of this flexibility in relation to scheduled monuments. It will better protect these nationally important designated sites and reduce conflict within the planning system.

Markets - temporary use of land (Class B of Part 4)

Q.61 Do you agree that the permitted development right for the temporary use of land should be amended

We do not have a view on the length of time a market can operate for.

However, amending the number of days for which a market can operate will require amendment to Schedule 2, Part 4, Class B of the General Permitted Development Order 2015 (GPDO)– temporary use of land. Unfortunately, this PDR allows for motor car racing, etc. on scheduled monuments. Amendments to this part of the GPDO present an opportunity to exclude scheduled monuments from the activities specified, to avoid the impact and risk of harm from motor car and motorcycle racing which is currently permitted.

Ensuring the sufficient capacity of open prisons

Q.64 Do you agree that there should be a prior notification process where the development under the Class M of Part 7 right is being used for open prisons?

Yes. Although not implemented, Historic England supported prior approval for the amendments to Class M Part 7, proposed in 2021. The reason for this being that there are both listed and non-designated historic buildings within the Prison Service portfolio. Accordingly, appropriate provisions are needed to assess the impact of any development proposals, including extensions to heritage assets or additional buildings within historic sites and their settings.

To ensure effective conservation of the historic environment, in line with legislation and policy, the historic environment provisions used in other GPDO classes should be replicated for public services infrastructure in relation to this PDR. This includes:

- Exclusions of the right for Article 2 (3) land.
- Protections for designated assets such as listed buildings and their curtilage, and scheduled monuments.
- Prior approval matters to assess and mitigate the impact on designated and non-designated heritage assets including known and unknown archaeology.

Call for evidence - nature-based solutions, farm efficiency projects, and diversification

Nature based solutions

Q.70 Please provide specific case studies (including planning reference numbers where available) which can help us understand what issues farmers and land managers are facing in relation to nature-based solutions.

We are currently unable to provide specific case studies but would be happy to meet to discuss the heritage issues that farmers and land managers face in relation to nature-based solutions.

Q.71 Would these issues be resolved by amending planning practice guidance or permitted development rights, or any other solutions?

Historic England would welcome the opportunity to collaborate in the review of planning guidance to support the delivery nature-based solutions, to ensure that it avoids and minimises harm to the historic environment whilst maximising the potential ecosystem benefits.

Q.72 Are there any success stories that we can learn from on individual cases, or in certain local planning authorities?

We have been involved in a number of projects that exemplify combined heritage and natural based solutions and would welcome an opportunity to discuss them.

Q.74 Do you foresee any unintended negative consequences that may result from more nature-based solutions coming forward (e.g., impacts to other species, flood risk, wildfire risk, risk to public safety, releasing contaminants from contaminated land or hydrology etc.)? How could these be avoided?

Historic landscapes and heritage sites can play an important role in supporting nature-based solutions, and the wider ecosystems services that they can provide. Nature-based solutions can also help to improve the condition and character of historic places. The past provides the most sustainable foundation for the present and future solutions and provides some of the most robust evidence and frameworks for nature-based solutions.

Narrowly focused nature-based solutions that do not take a holistic approach to the environment, however, have the potential to have an unintended negative impact on heritage assets and historic places. At a broad scale, there could be a loss of historic character and identity. This would be particularly harmful in protected landscapes where cultural heritage contributes significantly to the special qualities supporting designation.

Nature-based solutions could result in unintended direct physical harm to important heritage assets, if heritage impacts are not considered in project planning. For example, changes in land cover and vegetation or changes in ground water could result in direct harm to, or loss of, buried archaeology or designed landscapes. Where nature-based solutions propose significant change to land cover there is also the potential for negative impacts on the setting of heritage assets. The environment must be considered holistically to avoid unintended negative consequences, and maximise the potential for heritage and nature recovery to be mutually supportive.

Successful nature-based solutions should seek to understand the ecosystem benefits of heritage assets and can offer the opportunity to repair damaged historic landscapes, including where these support UK Biodiversity Action Plan priority habitats. Complementing existing long-standing habitats, such as historic parkland, rather than changing them will add to nature recovery. Heritage assets should also be sensitively incorporated into nature-based solutions, for example, avoiding tree planting on sensitive buried archaeology, will add to the mosaic of habitats developed.

The opportunities offered by the historic environment – in particular historic landscapes - should be integrated into Local Nature Recovery Strategies and their supporting guidance. This will help to ensure an integrated approach to maximising potential benefits. Farmers and landowners may also be able to identify opportunities for heritage-based projects to support nature-based solutions on their land through Biodiversity Net Gain schemes.

It is important that assessing the potential heritage impacts of nature-based solutions is an early and integral part of considering the overall environmental impact of individual schemes, positive and negative. Proposals, the design of schemes, and assessment of potential benefits and impacts should also be evidence-based.

Farm efficiency projects

Q.81 Do you foresee any unintended negative consequences that may result from more farm efficiency projects coming forward (e.g., impacts on nutrient pollution, protected sites or hydrology)? How can these be mitigated?

Yes. There are likely to be unintended negative consequences for the historic environment in terms of impacts to archaeological remains and the setting of listed buildings where appropriate controls are not in place. Appropriate screening and mitigation measures should be put in at an early stage of project design to avoid future conflicts and potential impacts.

Diversification of farm incomes

Q.88 Do you foresee any unintended negative consequences that may result from more farm diversification projects coming forward? How can these be mitigated?

Yes. We recognise the need for farmers and land managers to continue to farm in an economically sustainable manner. They are custodians of many historic buildings and of archaeologically important sites, as well as managing some of England's most iconic landscapes. Funding, such as through the Environmental Land Management Scheme, plays an important role in balancing different issues at play, as potentially do farm diversification projects. However, they have the risk of unintended negative consequences for the historic environment. For example, in places like the Lake District (a World Heritage Site), there are instances where the diversification project becomes more profitable than the primary activity of farming. They can also divert time and resources away for the primary activity and ultimately may result in abandonment of the farmed landscape.

There is also some evidence that farm diversification projects can fundamentally change the character of the farm complex to such an extent that, although all the buildings are still present, there is no recognisable 'farm' left.

To mitigate such consequences, it is necessary to ensure that the diversification initiatives are genuinely supporting the primary purpose of farms.

Strategy and Listing

25 September 2023