



Historic England

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## Stroud Local Plan Review Pre-Submission version May 2021

Dear Sirs

Thank you for consulting Historic England on the latest iteration of the Plan. Although there is much to commend, we do have several comments in relation to the soundness and legal compliance of the Plan. We do however hope that further clarification, discrete additional evidence and relatively modest associated changes may be able to satisfactorily address these matters.

1.0

**Chapter 3 Making Places** proposes sizeable development sites across the District. The Sustainability Appraisal (SA) and Strategic Assessment of Land Availability (SALA) highlights those specific proposed allocations where the significance of designated heritage assets may/will be affected.

The Plan proposes generic place making, heritage policy, and a requirement for master planning, and this may help to ensure that the significance of heritage assets in relation to these development sites may be appropriately conserved. However, the SA underlines the value and importance of explicit advice in the SALA to guide the form of future development and minimise harm. However, we note that this advice is not necessarily carried forward and included in the Plan.

Without explicit reference in the Plan to these specific recommendations from the evidence base, there is a risk they will not be appreciated by prospective developers, nor given appropriate weight and applied. We would therefore suggest that consideration is given to inclusion of these conditions from the evidence base into the body of the Plan to provide clarity and certainty ensuring that the significance of designated assets is sustained.

2.0

### Site allocation PS05 Minchinhampton

The heritage impact assessment <sup>1</sup> considers the site to be highly sensitive as it adjoins an area which is designated as a Scheduled Ancient Monument: "The Bulwarks" is a fragment of a much more extensive ancient earthwork, which is evident at various points on the Common. As such the proposed allocation may have archaeological interest that could affect the future form and capacity of the site. Ideally therefore, this further archaeological investigation

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<sup>1</sup> Site MIN 005 – Land at Glebe Farm, Strategic Assessment of Land Availability (SALA) Heritage Impact Appraisal, May 2017



should ideally be undertaken before the Local Plan's Examination to allow its findings to be considered and to provide greater certainty that the site can accommodate the level of housing currently envisaged and to provide clear advice in the body of the Plan as to what the design response should be to conserve historic significance. This accords with the advice provided by Historic England in December 2015 to the Stroud DC in relation to planning application S.15/2567/FUL.

3.0

### **Strategic Site Allocation Policy PS20 Stonehouse - Eco Park M5 Junction 13**

Page 114. Point 9. *"A layout of uses, density and built form and character which ensures less than substantial harm to IHCA".*

This condition should be reviewed as it appears inconsistent with the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 72 that requires local planning authorities to pay special attention in the exercise of planning functions to the desirability of preserving or enhancing the character or appearance of a conservation area.

4.0

### **Strategic Site Allocation Policy PS37 Wisloe new settlement**

The National Record of the Historic Environment (NRHE) includes reference to the site containing a variety of medieval, potentially Roman and Prehistoric archaeology. Suitable conditions should therefore be included in the body of the Plan to ensure these potentially nationally important features are appropriately considered, and their significance conserved in accordance with national policy and guidance.

5.0

### **Strategic Site Allocation Policy G2 Land at Whaddon**

While there are no designated heritage assets within the proposed allocation, the development of this site will have a considerable impact upon the setting of the Church of St Margaret to the south-west side of Whaddon. Built in the 13th century with a 15th century tower and restored in 1855, the list description notes the prominence of the tower in the landscape.

The Church of St Margaret is designated Grade II\* and as such is in the top 8% of listed buildings. Therefore, greater weight should be given to its conservation. The National Planning Policy Framework (NPPF) defines 'conservation' as 'the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance'.

The Church of St Margaret sits prominently on elevated land to the north of the site and its primacy and visibility over the rural landscape contributes to its heritage significance. Historic England considers that it is important a full and comprehensive assessment of the significance of the Church of St Margaret and its setting takes place at this stage prior to the Examination of the Local Plan. The broad desk-based assessment<sup>2</sup> already undertaken is unfortunately insufficient to provide the necessary level of proportionate evidence and clarity required to inform the principle and form of the proposed allocation. This is because an appropriate understanding of the significance of this affected heritage assets will inform the strategic landscaping, the layout and form of development that will be required to positively respond to the relationship of the setting of the Church and may affect the assumed capacity of the site to accommodate the number of homes envisaged in the Plan.

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<sup>2</sup> Site BRO 002 – Land at Whaddon. Strategic Assessment of Land Availability (SALA) Heritage Impact Appraisal, May 2017



The suggested 150 metre (approx.) landscape buffer illustrated in map G2 is unlikely to provide an adequate design response.

Central to our advice is the requirement of the Planning (Listed Buildings and Conservation Areas) Act 1990 in Section 66(1) for the local authority to “have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses”. When considering the proposed allocation, in line with Para 193 of the NPPF, great weight should be given to the asset’s conservation and that the more important the asset the greater the weight should be.

When considering development that has the potential to affect an asset’s setting, Historic England’s guidance (Historic Environment Good Practice Advice in Planning - Note 3. The Setting of Heritage Assets) should be referred to. The key steps for the assessment of setting are provided on page 7 of the guidance. <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

We would also highlight the 19<sup>th</sup> century ‘Field Buildings’ in the centre of the site. Prominent within the landscape and where footpaths converge, whilst this collection is not formally designated, it does appear to be of significance and should therefore be retained to support good design practice in accordance with NPPF para 127 c). Retaining the Field Buildings would help provide a tangible link of the future development’s relationship to the past and should be a positive component of any master planning and therefore included as a condition of any allocation in this Plan. The local authority can, and probably should, consider inclusion of the Field Buildings in its local list of non-designated heritage assets.

In view of our concerns we hope that further discrete evidence will be gathered, and associated adjustments made to help ensure compliance with national policy and statutory obligations, and in so doing, secure a sound, sustainable and robust development plan.

We look forward to continuing to work constructively with you and remain available to discuss the above and seek a positive outcome.

Sincere regards

