

SOCG Appendix A. Unresolved Historic England issues - Stroud Local Plan.

17 February 2023

Date of HE comments	Summary of comment	Issue/recommendation
	Stroud District Local Plan Review Draft Plan November 2019	
21 January 2020	<p>The SA and SALA Heritage Impact Appraisals* highlight a number of contentious proposed allocations. The latter recommends how the impact of development can be minimised, to an acceptable level (we assume), and also how development might enhance those assets, reflecting the expectations of legislation, national policy and guidance.</p> <p>It will therefore be important for the next (Submission) version of the plan to include those expectations in the body of the document to ensure those policies are clear to all, justified and in accordance with national policy. Those conditions may have an impact on their capacity.</p>	<p>We continue to encourage reference in the Plan to the specific recommendations of relevant evidence and assessments to ensure affected assets are taken into account and conserved.</p> <p>We would encourage reference in policy to what is actually required from the development in heritage terms.</p>
23 June 2021	<p>“...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.</p> <p>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.</p>	Historic England continues to encourage these outstanding concerns to be addressed.
23 June 2021	Specific issues raised in relation to PS05 Minchinhampton:	Historic England would appreciate a response to these specific matters.

	<p><i>The heritage impact assessment¹ 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 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 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.</i></p>	
23 June 2021	<p>Specific issues raised in relation to PS20 Stonehouse:</p> <p><i>Policy criterion 9: “A layout of uses, density and built form and character which ensures less than substantial harm to IHCA”.</i></p> <p><i>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.</i></p>	Historic England would appreciate a response to these specific matters.
23 June 2021	<p>Specific issues raised in relation to PS37 Wisloe:</p> <p><i>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.</i></p>	Historic England would appreciate a response to these specific matters.
21 January 2020	<p>Policy G2 Land at Whaddon. The SALA indicates, “If the whole site were to be developed, the impact on the heritage assets in the area, on their collective setting and their individual significances, would be very damaging”. How should the Plan and the capacity</p>	Historic England encourages the LA to positively respond to these comments.

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

	<p>of the site to accommodate development respond to this? Presently Policy G2 makes no reference to the Grade II* Listed St Margaret's Church. It is vital to consider at an early stage the requirements of S66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the weight to be applied to the conservation of the significance of a heritage asset.</p>	<p>There is no indication that the 3,000 new homes, the associated community developments and infrastructure can be accommodated whilst avoiding/minimising harm.</p>
	<p>*SALA heritage impact assessment (Site BRO 002 (Policy G2) – Land at Whaddon): Examination Library ref. EB50 Strategic Assessment of Land Availability (SALA) Heritage Impact Appraisal, May 2017. Includes the following: <i>Overall, the impact on the setting of the listed buildings and the character of the settlement would be likely to preclude development on a significant 'buffer' to the west of Whaddon, and to constrain new built form principally to the west and south of the site, where the impact on features of heritage interest is likely to be insignificant, subject to the scale, massing and design of any new development. An adequate buffer would incorporate what is effectively site BRO 004 (off Grange Road), and up to half of site BRO 003 (ideally keeping the line of development to the west of the existing field boundary /hedgerow); plus a substantial swathe of land running the length of the Stroud Road, southwards from Church Lane/site BRO 003, down to Brook Farm, following existing field boundaries. Massing and layout of the developable area could further protect the heritage interest and landscape context of St Margaret's by preserving some kind of vista towards the landmark tower from Naas Lane – perhaps by incorporating some elements of open space / green infrastructure, which would enable the tower to peek above or between built form.</i></p>	<p>Policy G2 does not recognise the considerable harm to the significance of St Margaret's Grade II* Listed Church; how that harm is justified; nor what measures would be required to minimise that harm and positively respond to heritage assets and their settings as part of a positive heritage strategy.</p>
23 June 2021	<p>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</p>	<p>Historic England welcomed the commissioning of an HIA for the site (Border Archaeology 20 December 2022). However, we await to hear how the LA intends to specifically respond to this evidence, further to the SALA Heritage Impact Assessment (above), to inform the principle, and form of future development. We feel that it is important</p>

	<p>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'.</p> <p>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.</p> <p>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 <u>prior</u> to the Examination of the Local Plan. The broad desk-based assessment² 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.</p> <p>The suggested 150 metre (approx.) landscape buffer illustrated in map G2 is unlikely to provide an adequate design response.</p> <p>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.</p> <p>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</p>	<p>for the LA to set the appropriate and necessary response to conserve the significance of the affected assets; and whether the proposed amount of development is deliverable in doing so.</p>
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² Site BRO 002 – Land at Whaddon. Strategic Assessment of Land Availability (SALA) Heritage Impact Appraisal, May 2017

	<p>setting are provided on page 7 of the guidance. https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</p> <p>We would also highlight the 19th 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.</p> <p>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.</p>	
<p>HE response by email. 10 January 2023</p>	<p>Heritage Impact Assessment - Whaddon (proposed site allocation G2 in the submitted Draft Local Plan). Border Archaeology. Received 20 December 2022</p> <p>Thank you for sharing the HIA.</p> <p>Although the ORIGIN3 draft masterplan for Taylor Wimpy relates to the preparation of a future planning application it does however help to demonstrate that the site may be able to accommodate a quantum of development in a manner that could, if suitably designed, minimise harm to the significance of St Margaret's (Grade II*) and Yew tree Farmhouse (Grade II).</p> <p>The LP will need to state that any proposal should ensure a positive response to the affected heritage assets within the wider landscape setting and in particular minimise harm to the significance of St Margaret's.</p>	<p>On 27 January 2023 Historic England had a constructive meeting with LA officers to discuss our comments and we hope a response to these and those previously submitted (above) will be forthcoming and associated proposed modifications before the Plan is further examined.</p>

	<p>There is scope to agree some key design principles in the policy to ensure such a positive response to the II* church via a reasonable buffer (approx 250m as indicated in the ORIGIN3 Masterplan (pg 59 of the HIA); and 3 key vistas/channelled views through the development to the tower. However, the most extensive, being from Naas Lane (SW – NE direction), needs to be more generous/have a wider splay at the northern end, than indicated in the ORIGIN3 Masterplan.</p> <p>The development should also be designed to maintain a visual connection with the Cotswold escarpment to the south.</p> <p>Due to the potential significant archaeology especially to the SE of the site the policy should require a layout which is informed by details of archaeological investigation, evaluation and mitigation.</p>	
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