



ENGLISH HERITAGE

WEST MIDLANDS

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Dear Mr Barber,

Warwick District Council Local Plan – Village Housing Options and Settlement Boundaries Consultation

Thank you for providing an opportunity to comment on these proposals.

My consideration and response is based on the expectation there has been a proper assessment of the significance of heritage assets affected, including their settings¹; and the proposals support the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF), with one of the core dimensions being the protection and enhancement of the historic environment².

The NPPF requires Local Plans, as a whole, to set out a positive strategy for the conservation and enjoyment of the historic environment. This means ensuring that the sites which it is proposing to put forward for development, will assist in delivering such a strategy and not contradict it.

The selection of sites for development needs to be informed by the evidence base and the Plan should avoid allocating those sites which are likely to result in harm to the significance of the heritage assets of the Plan area. Where adverse impacts are unavoidable and justified, in accordance with the NPPF, the Plan should consider how that harm might be reduced and any residual harm mitigated³. This could include measures such as a reduction of the quantum of development at a site, amending the types of development proposed, or locating the development within another part of the site allocation. Such initiatives need to be fully justified and evidenced to ensure that such measures are successful in reducing identified harm.

The allocation of sites for development may also present opportunities for the historic environment. For example, new development may better reveal the significance of heritage assets⁴, or may provide an opportunity to tackle heritage at risk (e.g. at Aylesbury House).

¹NPPF paragraphs 157, 158, 169, 170, 182

² NPPF paragraph 7

³ NPPF, Paragraph 152

⁴ NPPF, Paragraph 137



Policies for allocated sites need to make reference to important historic environment considerations in order to guide how development should be delivered. For example, this might require the Policy to include detailed criteria or providing supplementary information within the supporting text.

Most, if not all these proposals in the emerging Plan may fulfil the above and accord with the provisions of the NPPF but at present this remains to be determined.

For example your Landscape Sensitivity Assessment (November 2013) fails to provide an appropriate historic environment assessment.

It fails to assess whether, how and to what degree the settings of affected heritage assets make a contribution to their significance, and set out how the proposed development would affect that significance.

For example the evidence base, including the Landscape Sensitivity Assessment, fails to establish how site 1 at **Baginton** contributes to the character, appearance and significance of the Conservation Area; and the effect of the proposed development on those attributes. It appears neither the Baginton Conservation Area Appraisal nor the industry standard guidance on assessing the impact of development on the setting of heritage assets⁵ have been applied. Consequently it is not clear whether the proposals are in accordance with the NPPF policies for the protection and enhancement of the historic environment and Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The same issue and absence of relevant evidence relates to the following including, **Barford** (Site 2) and proposed development adjacent to the Conservation Area and near to Barford House (Grade II*).

The proposed allocation at **Hill Wootton** is directly opposite a Grade II listed building. How does the setting contribute to the listed buildings significance and what is the implication of the development on that significance?

The same applies to **Kingsdown** Farm house (Grade II listed). Evidence to show the application of a methodical assessment needs to be demonstrated.

Leek Wootton. A sizable development is proposed within the setting of Woodcote House (Grade II listed). Evidence needs to demonstrate the significance of the heritage assets, including the conservation area, have been established and the impacts on that significance understood to inform the principle and design response.

Radford Semele. The surroundings of the Parish Church of St Nicholas (Grade II listed) and other neighbouring heritage assets contribute to their significance. To what extent is not made clear, nor the degree of harm, the justification for that harm, or the rationale for the extent of safeguarded land adjacent to the church. A robust setting assessment should be prepared in accordance with the aforementioned advice to inform this proposal.

If harm would arise is the Local Authority able to demonstrate there are no other reasonable alternative options?

Aylesbury House, Hockley Heath

This proposal will have a direct impact on the significance of this rundown Grade II listed building, its associated curtilage structures, walled garden and designed landscape.

⁵ The Setting of Heritage Assets (English Heritage October 2011)

As this historic complex's setting clearly contributes to its significance any harm must be limited. A degree of harm may however be justified by the wider public benefit of a heritage led regeneration scheme, repairing, conserving and appropriately utilising those important elements of the site described above.

A specific historic environment assessment of the site is essential to inform the principal, location and form of any future development.

English Heritage may broadly support an appropriate constructive conservation of these heritage assets to secure a long term sustainable future. Reference to our advice on *enabling development* would appear appropriate in this respect.

Conclusion

It is vital that before the principle of any allocation is established, discreet evidence to assess the effects of the proposed developments on the significance of affected heritage assets is prepared and applied to ensure appropriate informed decisions are taken in accordance with the provisions of the NPPF.

I look forward to further engagement on the above.

Yours sincerely,



Rohan Torkildsen
Planning Adviser for the West Midlands and South West