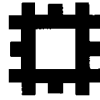


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205'

Development Policy,  
Warwick District Council,  
Riverside House,  
Milverton Hill,  
Leamington Spa  
CV32 5QH

Our ref: WM 5399 RjT  
Your ref: -  
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newlocalplan@warwickdc.gov.uk

26 July 2012

Dear Sirs,

### Warwick Local Plan – Preferred Options Consultation

Thank you for providing English Heritage with the opportunity to further comment on this evolving strategic plan for the District. This correspondence will regrettably reiterate certain points made in previous letters dated 9 April 2010 and 5 July 2011; both are therefore attached for your information.

As the government's adviser for the historic environment, English Heritage broadly welcomes the positive strategy set out in section 11, and in particular Objectives 7 and 14 of the Plan.

I note a recognition in the Plan of the pressure for new development threatens the "*high-quality built and natural environments in the district, particularly historic areas*"<sup>1</sup> but however goes on to reassure that 10,800 new homes (to 2029) will be founded on "*best evidence*"<sup>2</sup> and located in the most suitable locations<sup>3</sup> to help ensure the historic environment is then protected and enhanced<sup>4</sup>.

The National Planning Policy Framework (NPPF) provides the context and justification for doing so, requiring Local Plans to be prepared with the objective of contributing to the achievement of sustainable development in accordance with the principles and policies for the historic environment.<sup>5</sup>

The following comments on a number of the proposed allocations unfortunately highlight an inconsistency with the above:

1 WLP PO Paragraph 4.8 point 6

2 WLP PO Paragraph 5.1

3 WLP PO Paragraph 7.6 "In addressing the important housing issues, the Local Plan will aim to...provide well-designed new developments in the most suitable location".

4 WLP PO Paragraph 4.6

"To protect and maintain the character of the District, the Local Plan will have to balance the growth of the District with the protection and enhancement of these assets".

5 NPPF Paragraph 151



### **Site D Land south of Gallows Hill, Warwick**

Key assets affected – Warwick Castle Park Grade I Registered Park and Garden; Warwick Castle Grade I Listed Building; Warwick Conservation Area

In comparison to all the nine sites assessed in the Landscape Character Assessment for Land South of Warwick (Richard Morrish Associates, 2009 - Referred to herein as the LCA Report), the site to the south of Gallows Hill is described as being the area of highest relative value to the setting of Warwick. It is the only site that is considered to be unacceptable in principle.

*“This is generally an area of well maintained agricultural land that is important to the setting of Castle Park and prominent in approaches to Warwick. We feel it should be safeguarded from development”*. Paragraph 5.4 LCA Report

*“Warwick and Leamington Spa have highly-valued historic cores and Warwick Castle and the associated Castle Park have national heritage significance. Protecting the setting of these features must be considered a principal goal of future development planning in the locality”*. Paragraph 5.1 LCA Report

It is needless to say any proposal which harms heritage assets of such national significance to such a degree is contrary to the NPPF<sup>6</sup> and the principles of sustainable development. The harm is not outweighed by the public benefit associated with this housing development.

It should be noted that the LCA Report does not refer to either the Historic Environment Record or the Warwick CA Appraisal; and it preceded the publication of the NPPF (March 2012); The Setting of Heritage Assets – English Heritage Guidance (October 2010); The Warwickshire Historic Landscape Characterisation (HLC) Report (WCC 2011)<sup>7</sup>; and the Conservation Plan for the park. If applied these are likely to reaffirm the sensitivity of the site and the unsuitability of the allocation.

### **Site WL5a Loes Farm, Warwick (Guy's Cliffe)**

The draft local plan fails to have adequately considered the impact on designated and undesignated heritage assets to determine the suitability of the allocation. The proposal would appear likely to cause substantial harm to undesignated heritage assets of significant value, and harm to the setting of designated assets that contribute to that assets significance. This would be contrary to the NPPF and the *great weight* that should be afforded the conservation of heritage assets.

I refer to my letter dated 10 April 2010.

*“You should ensure that thorough evidence is applied to determine whether the proposal would adversely affect the significance of the designated historic landscape and its setting including key views in and out. The direct and indirect impacts of major new development on the individual components that determine the relative value of Guy's Cliffe in total should be understood.*

*English Heritage considers that the well preserved areas of ridge and furrow should certainly be regarded as of national importance and preserved as a consequence, see:-*  
[http://www.english-heritage.org.uk/upload/pdf/turning\\_plough.pdf?1267377944](http://www.english-heritage.org.uk/upload/pdf/turning_plough.pdf?1267377944) “

The NPPF is clear that a draft local plan may be considered unsound if there has been no proper assessment of the significance of heritage assets in the area, including their settings,

<sup>6</sup> NPPF paragraph 132

<sup>7</sup> NPPF paragraph 170



and of the potential for finding new sites of archaeological or historic interest<sup>8</sup>, or, there has been no proper assessment to identify land where development would be inappropriate because of its historic significance.<sup>9</sup>

The Joint Green Belt Review recommends that to determine site suitability “finer grained, more detailed analysis” should be undertaken including the consideration of “Archaeological Constraints; Character, Setting; and Historic Landscape Character Analysis”<sup>10</sup>. This appears not to have been undertaken.

#### **Site K5 south east Kenilworth**

Previous correspondence highlighted the need to consider the evident significance of the adjacent Stoneleigh Abbey and designated Glasshouse Roman settlement, and the potential for further archaeology. Has this evidence been addressed?

Any future development would certainly need to protect the scheduled archaeology and its setting and that of the Grade II\* registered Stoneleigh Abbey Park.

#### **Coventry and Warwickshire Gateway - Baginton**

The scale and form of any future development here is currently unclear. However it should be noted that the area includes designated and undesignated heritage assets of great importance. In accordance with the national policy expectations referred to above, a specific historic environment assessment must be undertaken to fully understand the landscape’s special historic interest, the locations of particular historic significance and sensitivity. This can in turn inform the areas capacity, where development may best take place and what form it might take.

#### **Section 11. The Historic Environment**

One of the twelve principal objectives for planning in the NPPF is the conservation of heritage assets for the quality of life they bring to this and future generations<sup>11</sup>.

Conservation means maintaining what is important about a place and improving it where this is desirable. This is not a passive exercise. Consequently we welcome the proactive approach you intend to take.

To compliment these measures might I suggest the Plan also address and target specific environmental improvements; the assets within the area on the heritage at risk register and the opportunity afforded by CIL/S106 agreements.

I note paragraph 5.1 of the LCR Report. *“In addition and particularly as the towns are important tourist destinations, the quality of approaches to the town should be considered in all development planning. A combination of protection of landscape assets and enhancement or removal of landscape detractors should be considered in strategic planning”.*

Might the enhancement of the public realm be linked to creating an attractive environment for businesses and visitors? I refer to paragraph 14.18. How will the Local Plan compliment and help deliver the Warwickshire LTPs intention to “improve the quality of transport integration into streetscapes and the urban environment”?

Are there specific opportunities to demonstrate how CIL/S106 agreements could contribute towards the enhancement of individual assets or specific historic places, particular streets, spaces and the public realm?

8 NPPF paragraph 169

9 NPPF paragraph 157, seventh bullet-point.

10 Joint Green Belt Review paragraph 5.4.2/3

11 NPPF paragraph 17



Might the Plan address the particular issues identified during the development of the evidence base, including the ten monuments, four buildings and two parks on the national heritage at risk register?

Section 15 -*Green Infrastructure* appears to provide the 'bench mark' for a thorough and proactive strategy. I would be welcome the opportunity to help support a further refinement of Section 11 to achieve a similar comprehensive iteration.

Please don't hesitate in contacting me to discuss this letter and/or to progress the Plans positive response to the Districts significant and highly valued heritage assets.

Yours faithfully,



Rohan Torkildsen  
Planning Adviser West Midlands and South West



## ENGLISH HERITAGE

### WEST MIDLANDS REGION

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5 July 2011

Dear Sirs,

#### Warwick District Council Local Plan – *Issues* and SA scoping consultation

Thank you for consulting English Heritage on the proposed move from Core Strategy to Local Plan and the commencement of the associated SEA/SA process. The following comments reflect national policy and guidance for the historic environment provided primarily by PPS5-*Planning for the Historic Environment* (March 2010).

We note the preparation of a *Heritage and Built Environment* technical paper and welcome, in particular, the following:

- the “*strategic aim to protect and enhance the built environment*” (we presume it was intended that this statement covers heritage assets, a matter worth clarifying in future iterations);
- a recognition of the relationship between the prestige and condition of the historic environment and the Districts economic performance; and
- an appreciation of the importance of preserving the Districts’ distinctive heritage assets including landscapes and managing potential threats from neglect and insensitive development. The relevance of emphasising landscape being the importance of understanding the value of the historic landscape as a whole, its setting and integrity and not just the Districts individual cultural highlights.

Whilst the historic environment is considered to be in “*generally good condition*” you concede there are designated assets including buildings, parks and gardens and scheduled monuments on the national at risk register, and also “*pockets where the environment is less good and needs to improve*”. It will be important for the Local Plan to highlight where these pockets are – perhaps in the locality profiles?

We note a variety of quantitative matters including the transport ‘issues’ that have been mapped. On the other hand there appears to be a very limited amount of qualitative information mapped on the condition of the built and historic environment. In response we therefore suggest, for example,

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including a map showing the relative condition of important streets, places and spaces (“pockets”?) that might in turn point to a continued progressive approach to highway design and townscape improvements?

The Warwick Local Plan will need to include a defined “*positive and proactive strategy for the conservation and enjoyment of the historic environment*” (PPS5 HE3.1) including how you intend to enhance those assets at risk and those areas in need of improvement.

The Local Plan’s evidence base should acknowledge, and in turn respond to the following matters (currently overlooked).

- The Warwickshire Historic Landscape Characterisation project
- The Warwickshire Extensive Urban Survey
- The West Midlands Historic Farmsteads project
- The District and County Historic Environment Record
- Any local list of significant yet undesignated heritage assets
- Conservation Area Appraisals and Management Plans
- Any landscape, park and garden conservation plan

Local and county conservation colleagues may be able to advise and perhaps suggest other additional matters. Please also note that this information should be used to inform any review of the SHLAA to ensure prospective potential sites are appropriate and deliverable.

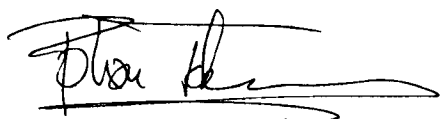
#### **SA appraisal framework - Objectives, questions, indicators and baseline**

With reference to objective 8 could you add “...and their setting” to the first related question in the middle column.

The indicators must relate to the associated objective and questions. Indicator 20, 22, and 23 are inadequate as they merely factually record the number of designated assets. Only indicator 21 bears any relationship to the potential actions of the Local Plan. We would therefore suggest you refer to the number of listed buildings, conservation areas, registered parks and gardens and scheduled monuments on the national at risk register and monitor performance accordingly. We would strongly encourage you to also include such information in the baseline and ideally in the locality profiles.

Please don’t hesitate in contacting me to discuss these comments or to progress the Plans positive response to the Districts significant and highly valued heritage assets.

Yours faithfully,



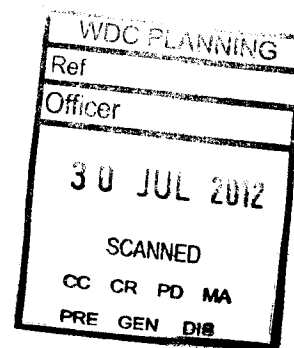
Rohan Torkildsen  
West Midlands and South West Planning Advisor





ENGLISH HERITAGE

WEST MIDLANDS REGION



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9 April 2010

Dear Sirs,

### **Warwick District Core Strategy – alternative sites consultation paper**

Thank you for consulting English Heritage on the suggested additional six strategic sites.

Before any commitment to any strategic site is made there is an expectation that a thorough strategic environmental assessment/sustainability appraisal will have been undertaken and that evidence would have been gathered and applied to demonstrate the relative suitability, capacity, deliverability and consistency with matters such as regional (RSS QE 1, 5 and 6) and national planning policy has been determined. At present whether or not this has occurred is unclear. In this respect we refer you to our previous correspondence of 25 September 2009, our specific comments relating to the evidence base and also to the recently published PPS5 and its associated good practice guide.

Please note that English Heritage considers that this apparent shortcoming is fundamental to the soundness of the Core Strategy.

In addition to this generic maxim please find an initial observation on each site based, unfortunately, on a rather crude desk top consideration.

#### **Site 1 –Kenilworth Wardens Cricket Club and Woodside Training centre**

The evident significance of the adjacent Stoneleigh Abbey and designated Glasshouse Roman settlement, and the potential for further archaeology should be carefully considered.

The specific function of the green belt in the separation of settlements and providing a natural setting to historic places should be acknowledged where relevant to all these sites.

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### **Site 2, 3 and 5 – Land at Campion School, Glebe Farm and Hurst Farm South**

The Historic Environment Record and County Council's Historic Landscape Characterisation project may prove to be of particular use in establishing the historic significance of these sites. Certainly due to the limited specific designations the broader historic value and the wider landscape setting should be investigated.

### **Site 4 – Loes Farm, Guy's Cliffe, Warwick**

You should ensure that thorough evidence is applied to determine whether the proposal would adversely affect the significance of the designated historic landscape and its setting including key views in and out. The direct and indirect impacts of major new development on the individual components that determine the relative value of Guy's Cliffe in total should be understood.

English Heritage considers that the well preserved areas of ridge and furrow should certainly be regarded as of national importance and preserved as a consequence, see:-  
[http://www.english-heritage.org.uk/upload/pdf/turning\\_plough.pdf?1267377944](http://www.english-heritage.org.uk/upload/pdf/turning_plough.pdf?1267377944)

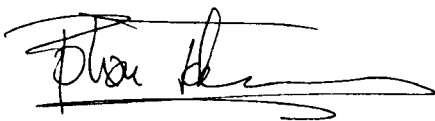
Nevertheless and without prejudice to the above principle, should a robust assessment of the landscape establish that some form of development may be appropriate there should be an expectation that change will lever an enhancement of the historic environment in accordance with PPS1 1(ix) and PPS5.

### **Site 6 – Land at Baginton**

This substantial area of proposed development includes designated and undesignated historic assets of great significance. Before any principle is established a specific historic environment assessment must be undertaken to fully understand the landscapes special historic interest, the locations of particular historic significance and sensitivity and the areas subsequent capacity to accommodate change and where this might take place and what form it might take.

It is important to understand the value of the historic landscape as a whole, its setting and integrity and not just the individual cultural highlights.

Yours sincerely,



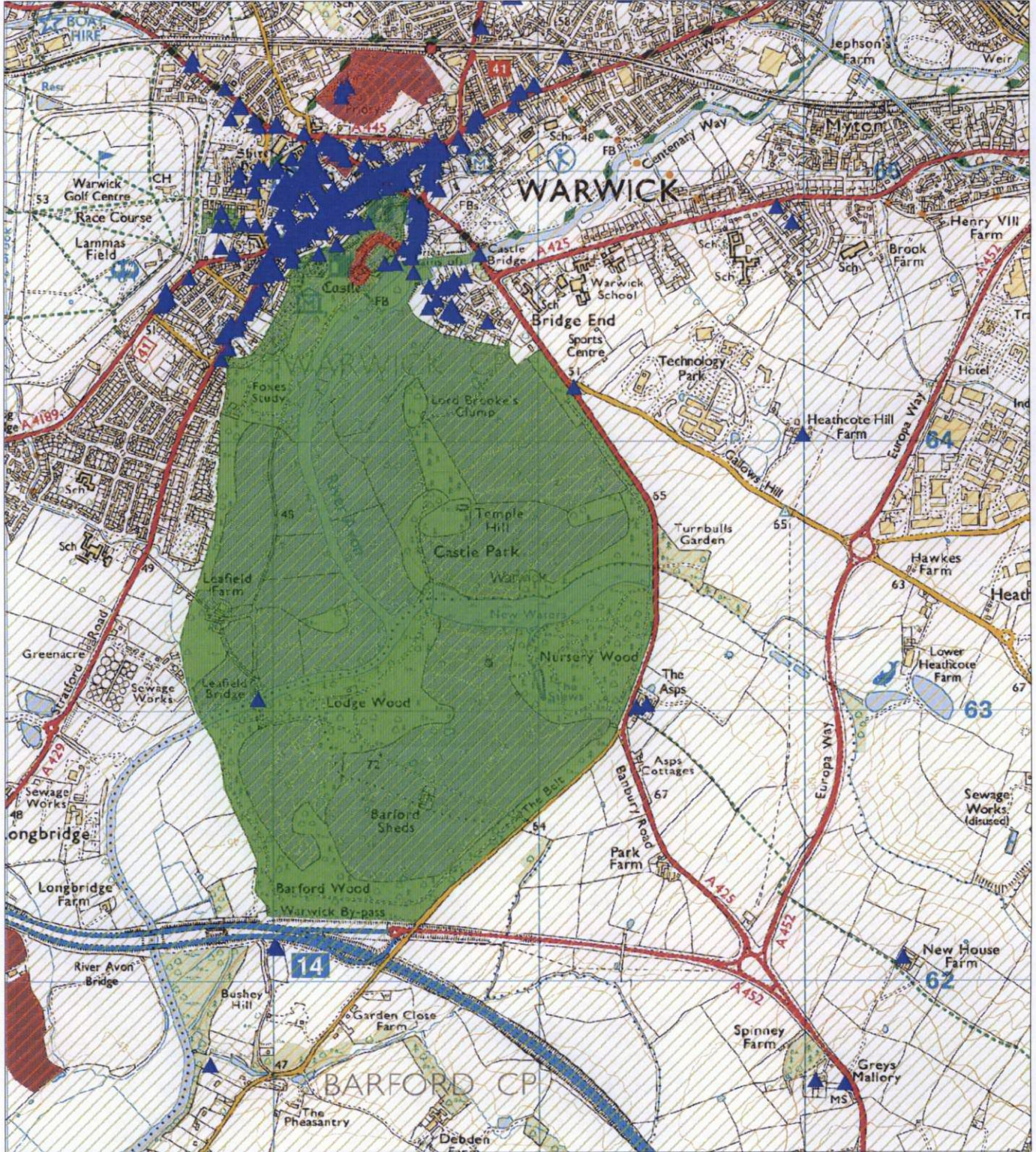
Rohan Torkildsen

Territory Planner (South West/West Midlands)  
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# Warwick Castle Park



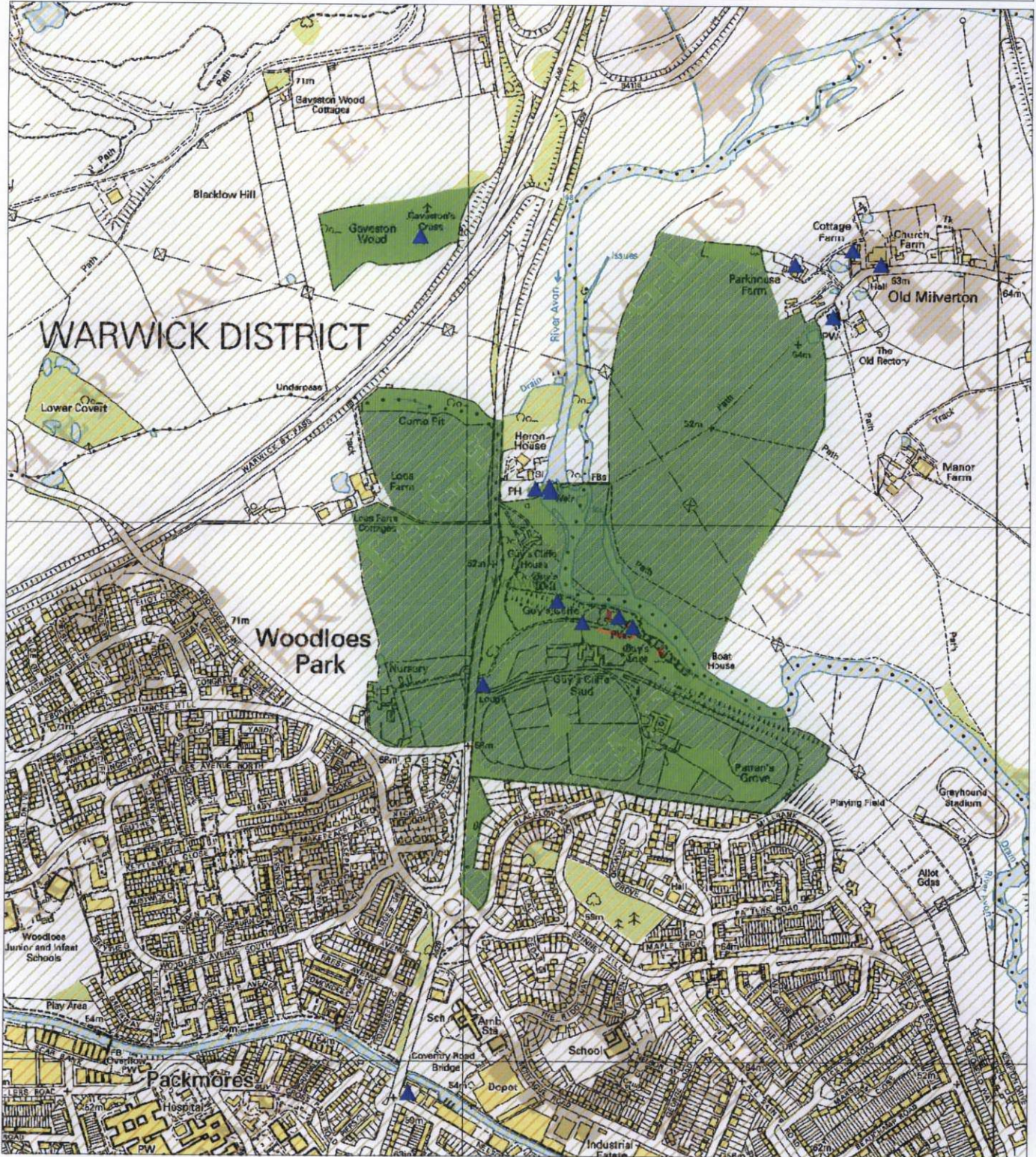
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# Loes Farm/Guy's Cliff



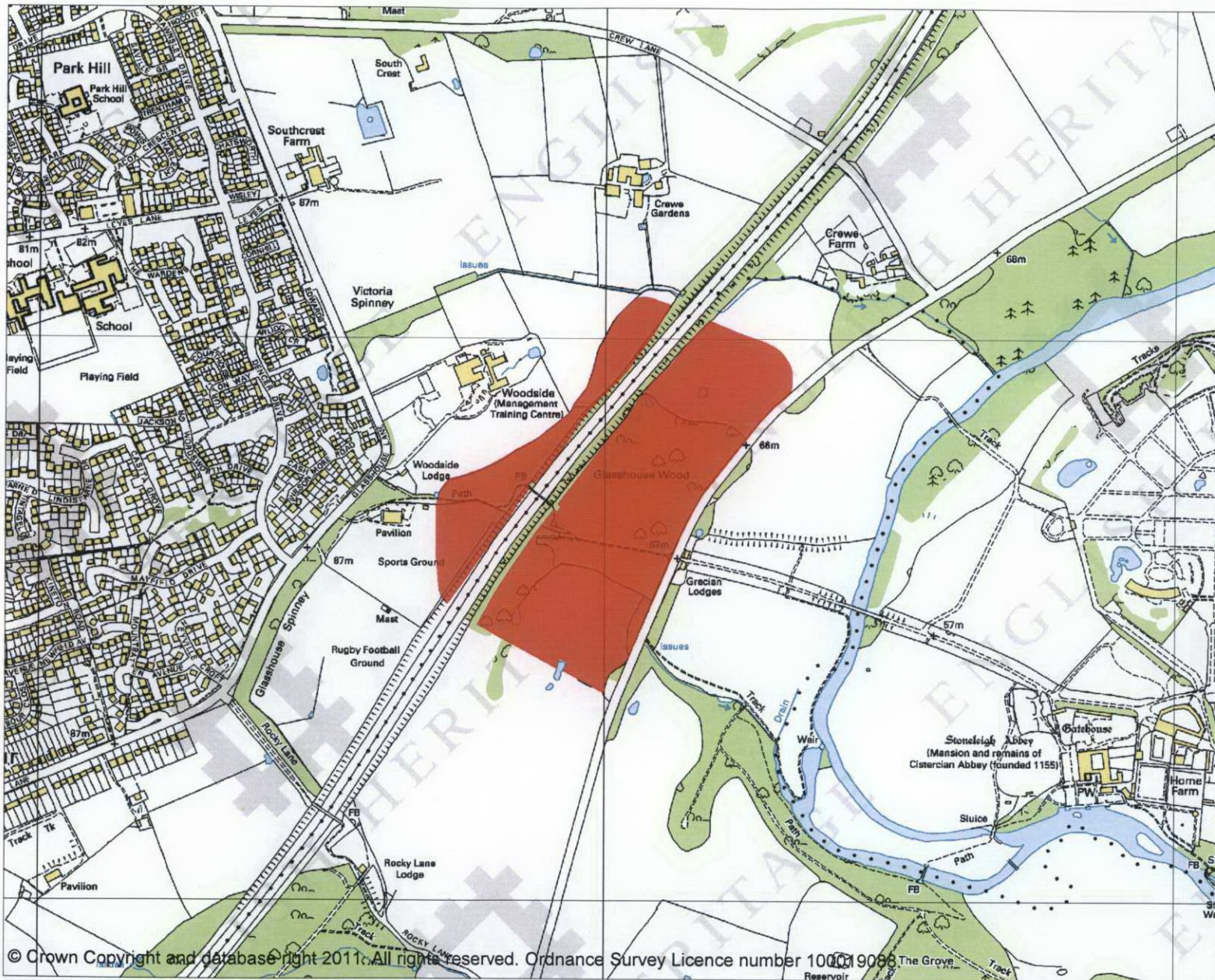
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**Name:** Roman settlement at Glasshouse Wood

**Heritage Category:**

Scheduling

**List Entry No :**

1005723

**County:** Warwickshire

**District:** Warwick

**Parish:** Ashow, Kenilworth

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**List Entry NGR:**

SP 31050 71669

**Map Scale:**

1:10000

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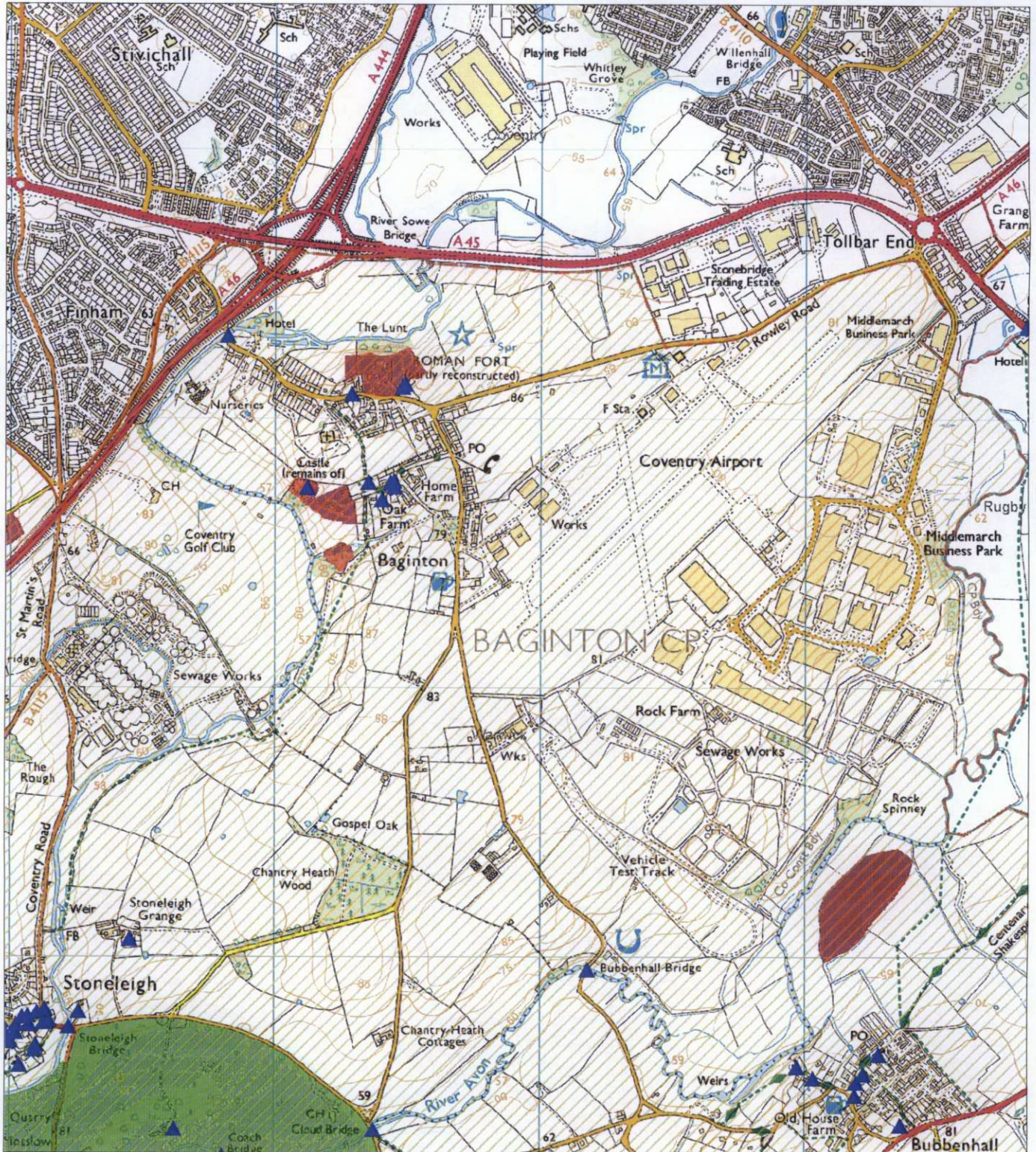
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# Coventry and Warwickshire Gateway



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