

**WYRE FOREST DISTRICT SITE ALLOCATIONS AND POLICIES AND
KIDDERMINSTER CENTRAL AREA ACTION PLAN EXAMINATION IN PUBLIC**

STATEMENT OF COMMON GROUND – ENGLISH HERITAGE

Appendix 3 – English Heritage Suggested Amendments to Policy SAL.UP6

Relationship to the Sustainable Community Strategy

The Sustainable Community Strategy recognises the importance of the historic environment in attracting visitors, residents and businesses to the District. The attractiveness of Bewdley as an historic market town is highlighted within the Sustainable Community Strategy.

Safeguarding the Historic Environment

The importance of the historic environment and heritage is outlined in the Government's Statement on the Historic Environment which identifies that:

"The historic environment is an asset of enormous cultural, social, economic and environmental value. It makes a very real contribution to our quality of life and the quality of our places." (The Government's Statement on the Historic Environment for England 2010)

The NPPF states that 'Local Planning Authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. (NPPF, paragraph 126) (SA-MA31)

Wyre Forest District contains a variety of heritage assets, including buildings, conservation areas, monuments, historic landscapes and archaeology. (SA-MA32) These assets all combine to provide a sense of place and help to make the area unique. The continued preservation, maintenance and enhancement of existing assets as well as identification of additional features is seen as a key objective for the future development of the District. Given the importance of the historic environment, and its heritage assets, it is proposed that a specific policy is included within this document to help guide future decisions that may affect national and/or local heritage.

[point iv) of my representation referred to the need to give greater prominence to and consistency in use of the key concept of significance in relation to heritage assets and their conservation and enhancement. I suggest that as an introduction to the policy – the concept of significance is outlined here drawing on the NPPF definition (e.g. including heritage interest) and also including how setting relates to significance – again the glossary in the NPPF is useful]

Safeguarding the Historic Environment

1. The Historic Environment and Heritage Assets

[Is there a need for an initial opening, positive statement in terms of supporting proposals that conserve or enhance the historic environment and heritage assets? – this then setting the basis for demonstrating proposals do protect, conserve etc]

Comment [A1]: I recommend that it would be more current to use the NPPF, for example making use of the statement on sustainable development and how it embraces the protection and enhancement of the HE (para 7), also para 9 and sustainable development involving seeking positive improvements in the HE and the HE as a core planning principle (page 6, 4th point from top). This setting the broad context before moving on to the detail of chapter 12.

Comment [A2]: After the first sentence it would be helpful to outline the scope of heritage assets in terms of covering both designated and non designated assets drawing on the NPPF definitions if necessary and or include in the plan's own glossary

Comment [A3]: As discussed the opening section of the policy could usefully be reorganised to cover general matters applicable to all applications and heritage assets. Following this general intro any asset specific considerations can then be covered

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Any development proposal affecting the District's heritage assets ~~including or~~ their setting should demonstrate how these assets will be protected, conserved and where appropriate enhanced. The District's heritage assets include:

- Conservation Areas, Listed Buildings and Scheduled ~~Ancient~~ Monuments.
- Buildings and Structures included on the Local Heritage List.
- ~~Landscape features including ancient woodlands and veteran trees, field patterns, watercourses, and hedgerows of visual, historic or nature conservation value.~~
- Archaeological remains and non-designated historic structures recorded on the County Historic Environment Record.
- ~~Historic parks and gardens (both Registered and those not designated) (SA-MA30).~~
- Landscape features of heritage significance including ancient woodlands and veteran trees, historic field patterns and hedgerows.

Comment [A4]: For consistency in policy and text there is a preferred tendency to refer to Scheduled Monuments so to cover any more modern structures

Proposals likely to affect the significance of a heritage asset, including its setting, should demonstrate an understanding of such significance and in sufficient detail to assess any potential impacts. This should be informed by currently available evidence.

Comment [A5]: In the supporting text I recommend this statement is expanded on by explaining relevant sources of information e.g. county HER, conservation area appraisals and management plans, historic landscape characterisation, Worcestershire Farmsteads Assessment Guidance .

Developments that relate to a Heritage Asset should be accompanied by a Heritage Statement.

When considering a development proposal which may affect a Heritage Asset, or when preparing a Heritage Statement, applicants should have regard to the following points:

- i. To ensure that proposals would not have a detrimental impact on the significance of a Heritage Asset or its setting
- ii. Any harm or loss of significance will require clear and convincing justification and
- iii. to identify how proposals make a positive contribution to the character and local distinctiveness of the area.
- iv. Insert a new point on encouraging their reuse where consistent with their conservation
- v. Insert a new point on a encouraging, in particular, proposals/opportunities for tackling heritage assets that may be at risk
- vi. In considering new development that may affect a heritage asset, proposals will need to identify how the scale, height and massing of new development in relation to the particular feature, and the materials and design utilised, does not detrimentally affect the asset or its setting.

Comment [A6]: Alternatively this could be stand alone point, to give a clear and positive statement on H@R as per NPPF 126

[the following two points are very detailed and better relocated to a section specifically relating to LB and historic buildings – with the wording of each appropriately amended e.g. listed buildings and locally listed buildings?]

ii-vii. That repairs, alterations, extensions and conversions of statutorily and non-statutorily listed heritage assets take into account the materials, styles and techniques to be used and the period in which the asset was built.

ii-viii. The installations of fixtures and fittings should not have a detrimental impact on the heritage asset, should be inconspicuously sited and proportioned and be designed sympathetically.

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~~iii. In considering new development that may affect a heritage asset, proposals will need to identify how the scale, height and massing of new development in relation to the particular feature, and the materials and design utilised, does not detrimentally affect the asset or its setting.~~

~~Proposals likely to affect the significance of a heritage asset or its setting should demonstrate an understanding of such significance. This should be informed by currently available evidence.~~

~~Development proposals that would have an adverse impact or cause harm to on a heritage asset and/or their setting and will cause harm or loss of significance will not be permitted, unless it is clearly demonstrated the following criteria are met:~~

~~i) For designated heritage assets:~~

- ~~A) (Substantial) harm or loss is necessary to achieve substantial public benefits that outweigh that harm; or~~
- ~~B) the nature of the asset prevents all reasonable uses of the site; and~~
- ~~C) no viable alternative use of the asset can be found and conservation through grant funding or another form of ownership is not possible; and [you may wish to expand on this in the reasoned justification – e.g. marketing, charitable/community ownership]~~
- ~~A)D) the harm or loss of the heritage asset is outweighed by the benefits of bringing the site back into use~~

- ~~a. There are no reasonable alternative means of meeting the need for development appropriate to the level of significance of the Heritage Asset.~~
- ~~b. The reasons for the development outweigh the individual significance of the Heritage Asset, its importance as part of a group and to the local scene, and the need to safeguard the wider stock of such Heritage Assets.~~
- ~~e.a. In the case of demolitions, that the substantial public benefits of the development outweigh the loss of the building or structure; or the nature of the asset prevents all reasonable uses of the site; or the loss of the heritage asset is outweighed by the benefits of bringing the site back into use. Redevelopment proposals should provide a design which provides an appropriate level of mitigation against the loss of the Heritage Asset in proportion to its significance at national, regional and local level exceptional design to mitigate against the loss of the Heritage Asset. (SA-MA33)~~

~~ii) For non-designated heritage assets~~

~~A) There are no reasonable alternative means of meeting the need for development appropriate to the level of significance of the Heritage Asset; and~~

Comment [A7]: Point ii of our representation centred on the consistency of these points (and para 7.58) with the NPPF and paras 133-135 relating to designated and non designated heritage assets and additionally for para 132 and the weight to be given to designated assets. Given there is only a single policy-one option would be to organise the criteria according to considerations for designated and non designated heritage assets as per the NPPF – I've currently outlined this in a way which does not differ between substantial and less than substantial harm as your opening sentence appears to set a strong line on protection – but you may wish differentiate these? B including substantial in (A) as highlighted and then including another sentence on less than substantial harm after a-d

Comment [A8]: These criteria relate to more than demolitions of a listed building or structure, and cover all designated heritage assets, so need to be more widely phrased and reflect those set out at para 133

Comment [A9]: I think the original first two criteria could be used here in support of non designated HA -

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B) The reasons for the development outweigh the individual significance of the Heritage Asset, its importance as part of a group and to the local scene, and the need to safeguard the wider stock of such Heritage Assets.

All proposals should provide an appropriate level of mitigation against the harm or loss to a Heritage Asset in proportion to its significance at national, regional and local level ~~exceptional design to mitigate against the loss of the Heritage Asset. (SA-MA33). [you may wish to also refer to para 136 in terms of ensuring development goes ahead]~~

Comment [A10]: Relevant to all proposals and hence made a separate point, also flows on to the recording paragraph

Where material change to a heritage asset has been agreed, recording and interpretation should be undertaken to document and understand the asset's archaeological, architectural, artistic or historic significance. The scope of the recording should be proportionate to the asset's significance and the impact of the development on the asset. The information and understanding gained should be made publicly available, as a minimum, through the relevant Historic Environment Record.

[Enabling Development - this is mentioned at 7.57 in the supporting text. I suggest it might be helpful to include in policy that any proposals for ED will be considered in the context of national advice (e.g. EH updated advice on ED, 2nd edition – refer to this in the reasoned justification). The key considerations of e.g. benefits outweigh any disbenefits (e.g. NPPF 140), and demonstrated that no alternative option could also be included in the policy and expanded further in the reasoned justification e.g. series of criteria outlined at page 5 in the ED advice]

2. Conservation Areas

When development is proposed in, or adjacent to, a Conservation Area, proposals should accord with the existing (or draft) Conservation Area Character Appraisal and seek to enhance or better reveal the significance of the area. Development should not adversely affect views into, ~~or~~ out of or within the Conservation Area.

Comment [A11]: Point (iii) in my representation

Proposals for the demolition of a building or structure in a Conservation Area will only be permitted where it has been clearly demonstrated that:

- i. It has no recognised interest in itself or by association, and no value to the character of the Conservation Area.
- ii. Its demolition ~~and~~ replacement would benefit the character or appearance of the Conservation Area.
- ~~iii.~~ [Is there a need to also consider its potential for repair and or reuse?]
- ~~iv.~~ Proposals include detailed and appropriate proposals for redevelopment, together with clear evidence redevelopment will proceed.

Comment [A12]: I recommend this is rephrased so to use the term significance and reflect para 138 of the NPPF in terms of its significance and contribution to the significance of the CA

Proposals that affect shop fronts within a Conservation Area should have regard to the Council's Shop Front Design Guidance.

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[We discussed the option of extending the policy to cover specific policy elements for the other types of heritage assets in order to help the balance of the policy, the structure of the policy, avoid repetition and draw more on the reasoned justification. Outlined below are ideas on this e.g.]

Comment [A13]: As for example in relation to point

For each asset type consideration could be given to referring to the relevant part of para 132 in terms of the weight to be given to conserving the asset – this serving to build on the general requirements relating to the loss / harm of significance. Or alternatively this could be added to each relevant part of the reasoned justification

Archaeological Sites: [the policy wording could use text included as part of the last bullet point on p87/88 particularly with regard to the HER and desk/ field evaluation. Relevant sentences in para 7.54 could also be put into policy e.g. 3rd (in situ preservation), 4th (mitigation measures).

Listed Buildings and Local List Buildings and Structures:

- see suggested comment above on relocating the two detailed criteria which relate more to buildings?

- For the local list – the policy could set out the criteria used for identifying local list buildings? This could be useful in the context of neighbourhood plans, where they might be interested in identifying local list buildings

-for historic farmsteads could include the cross ref to the rural diversification policy and use of Worcestershire Farmsteads Guidance

Also at the end of the policy include a statement on the proposed SPD – as discussed at the meeting and committed to in the Core Strategy

Reasoned Justification

Heritage assets are a non-renewable resource; once destroyed they can not be reinstated. They are a precious and finite asset and are powerful reminders of the work and life of earlier generations. The benefits of conserving preserving and enhancing heritage assets include:

- providing the potential to be a form of sustainable development, by re-using existing structures and therefore reducing carbon emissions.
- helping to influence the character of an area and give it a sense of place.
- providing opportunities to be the catalyst for regeneration within an area and inspiring new development and imaginative design.

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The retention and enhancement of the District's heritage assets are therefore fundamental aims of ensuring that the area retains and embraces its character so that it can be enjoyed by generations to come. The historic environment is also an important part of green infrastructure and a green infrastructure led approach to development could aid in the conservation of historic environment features, for example, by allowing archaeology to remain in situ or strategically placing green space to preserve the setting of a Listed Building or Scheduled Ancient Monument. Therefore this policy also has close links with SAL.UP3: Providing a Green Infrastructure Network.

[Include a short summary of relevant evidence base to help understand the significance of and impacts on the significance of heritage assets]

Heritage Statements

The scope and degree of detail necessary in a Heritage Statement will vary according to the particular circumstances of each application. A statement should summarise the heritage interest of the heritage asset (archaeological, architectural, artistic or historic) and its significance before considering the impact of proposals. A Heritage Statement does not replace the need for an archaeological desk-based assessment or archaeological field evaluation. Where the direct impact of the proposed development, its size, its proximity to, and/or the importance of the heritage asset(s) affected are considerable, it may be appropriate to require further detailed information to accompany an application. Factual inaccuracies within Heritage Statements may render them invalid.

The following is a guide to the sort of information that the Council may require for different types of application:

- For applications for **listed building consent**, a written statement that includes a schedule of works to the listed building(s), an analysis of the significance of the archaeology, history, architecture and character of the building/structure, the principles of and justification for the proposed works and their impact on the special character of the listed building or structure, its setting and the setting of adjacent listed buildings or other associated heritage assets may be required. A structural survey may be required in support of an application for listed building consent.
- For applications for **conservation area consent**, a written statement that includes a structural survey, an analysis of the character and appearance of the building/ structure within its setting and/or its significance within its setting, the principles of and justification for the proposed demolition and its impact on the special character of the area may be required.
- For applications affecting a Registered or Locally Listed Historic Park and/ or Garden, a written statement setting out the principles of and, justification for, the proposed works and their impact on the significance ~~special character~~ of the designed landscape or its setting will be required. The statement may need to include an historic landscape assessment, a site survey and analysis of the historic landscape, an archaeological assessment, a tree survey, an ecological survey and/ or a management plan.

Comment [A14]: Amended to reflect better 'heritage interest' as defined by the NPPF – archaeological, architectural, historic, artistic

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- For applications either related to or impacting on the **setting of heritage assets** ~~(ie listed buildings and structures, historic parks and gardens, historic battlefields and scheduled ancient monuments)~~ a written statement of **how the setting contributes to the significance of the heritage asset, and** the impact on ~~this~~ **the significance special character of the historic asset, that includes** Plans showing historic features that may exist on or adjacent to the application site may be required, along with an analysis of the significance of the archaeology, **architecture**, history and character of the ~~asset~~ **building/structure**, the principles of and justification for the proposed works and their impact on ~~the its significance special character of the listed building or structure, its setting and the setting of any associated assets adjacent listed buildings~~. In the case of Historic Parks and Gardens, an historic landscape assessment may be required **and account taken of historic views and vistas**.
- For applications **within or adjacent to a conservation area**, an assessment of the impact of the development on the character and appearance of the area may be required.
- For applications for demolition or alteration of a **building** identified on the Worcestershire Historic Environment Record or on a Local Heritage List, where such a list exists, an analysis of the significance of the **architecture**, archaeology, history and character of the building/structure, the principles of and justification for the proposed works and their impact on the building or structure, its setting and the setting of adjacent **heritage historic** assets may be required. A structural survey may also be required.
- For all applications involving the **disturbance of ground** applicants are advised to check the Worcestershire Historic Environment Record to determine whether the scheme will affect known, or has the potential to affect previously unrecorded heritage assets. Applicants may need to commission an assessment of existing archaeological information or an archaeological field evaluation and submit the results as part of the Heritage **Statement**.

Comment [A15]: Amended to refer to all heritage assets not just designated in terms of the consideration of setting

Listed Buildings and Local Heritage List

There are in the region of 1000 ~~Statutory~~ Listed Buildings and structures within the District, together with 17 Conservation Areas and 9 Scheduled Ancient Monuments. In addition there are approximately 900 buildings and structures currently on the Wyre Forest Local Heritage List. The Local Heritage List is being produced on a phased basis with surveys of the three main towns and the rural areas of Wolverley & Cookley and Blakedown all completed. It is envisaged that the list will continue to be updated in the remainder of the rural areas over the next few ~~years~~.

Comment [A16]: See comments on policy and strengthening its archaeological content by relocating parts of this text to the policy

Comment [A17]: Could break down according to grade I, II*, II

Comment [A18]: Could outline here or in the policy the criteria being used to identify local list buildings

Conservation Areas

Conservation Areas are "areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance". They recognise the importance of conserving the wider townscape and its setting, rather than just individual listed buildings and structures, or groups of such buildings.

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There are currently seventeen Conservation Areas in the District, these are:

- Areley Kings (semi-rural location, edge of Stourport-on-Severn)
- Bewdley (Town Centre)
- Blakebrook (suburban Kidderminster)
- Broome (rural hamlet)
- Chaddesley Corbett (rural settlement)
- Churchill (rural hamlet)
- Church Street (Kidderminster Town Centre)
- Green Street (Kidderminster Town Centre)
- Harvington (rural hamlet)
- Ribbesford (rural hamlet)
- Staffordshire and Worcestershire Canal
- Stourport-on-Severn No 1 (Canal Basin and Town Centre)
- Stourport-on-Severn No 2 (Town Centre)
- Gilgal (Stourport-on-Severn)
- Upper Arley (rural settlement)
- Vicar Street and Exchange Street (Kidderminster Town Centre)
- Wolverley (rural settlement)

~~Government guidance on the historic environment, places a presumption in favour of the preservation and enhancement of historic assets and features such as Conservation Areas.~~

Each of the designated Conservation Areas within the District has an associated Conservation Area Character Appraisal (except for Blakebrook and Areley Kings) and therefore new development, within or adjacent to a Conservation Area, will need to take full account of the detail contained within the appropriate Character Appraisal.

Comment [A19]: NPPF provides a presumption in favour of SD – which can be taken as to include the protection and enhancement of the historic environment – but applicable more generally . See comments on text at beginning of policy

Carefully considered, high quality designs that provide a successful contrast with their surroundings can preserve and enhance character, as well as schemes that employ authentic historical forms and features. Careful treatment of the setting of a building is also vital to ensure that new development complements and enhances its surroundings.

[Could include a commitment to consider the introduction of Article 4 Directions?]

Archaeological Sites

Scheduled ~~Ancient~~ Monuments (SAM's) are sites and structures legally protected under the Ancient Monuments and Archaeological Areas Act (1979). They may be publicly or privately owned. The following sites are SAM's:

- Arley Wood Camp (Upper Arley)
- Baches Forge (Churchill)
- Barrow Hill (Chaddesley Corbett)
- Bowercourt Farm moated site and ponds (Rock)
- Drakelow hill fort (Wolverley)
- Harvington Hall moated site, ponds and quarries (Chaddesley Corbett)
- Pickards Farm moated site (Upper Arley)
- Rock Farm moated site (Rock)
- Wassell Wood moated site (Kidderminster Foreign)

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Archaeological remains provide crucial links to the past and can provide useful information about local heritage. Appropriate steps must be undertaken to identify and protect them as they are easily damaged or destroyed when development takes place. To protect the integrity of archaeological remains, preservation should take place in situ where appropriate, taking into account the established significance of the heritage asset. Where it is not possible to protect remains in situ reasonable and agreed mitigation measures will be required. Early consultation with the Worcestershire Historic Environment Record is essential for any sites that could potentially have archaeological interest. Not all archaeological remains will have been previously identified and sites may have archaeological potential.

Comment [A20]: See comments on the policy and suggestions for relocating parts of the text to the policy

Historic Landscapes

The local landscape is the product of complex historical processes and past land uses. Much of the value of the historic landscape lies in its complexity, diversity and local distinctiveness. Worcestershire Archive and Archaeology Service has ~~completed~~ ~~recently undertaken an~~ Historic Landscape Characterisation of the County as part of English Heritage's national programme. This provides information on the surviving historic character of the landscape and landscape features of heritage significance. The Historic Landscape Characterisation provides a framework for informed landscape management strategies, spatial planning, development control and conservation issues. It will also allow future changes in the historic landscape to be monitored.

The West Midlands Farmsteads and Landscapes Project was published in 2010. Historic farmsteads make a significant contribution to the rural building stock, landscape character and local distinctiveness. In Wyre Forest District, there is a ~~very~~ high level of residential use and conversion of such buildings. The ~~forthcoming~~ Worcestershire ~~Historic~~ Farmsteads ~~Assessment~~ ~~Guidance~~ ~~Toolkit~~ should be used to inform proposals at the earliest stage to help understand the heritage potential and significance of a site and its capacity for change. The Guidance will be a material consideration when assessing applications affecting historic farmsteads.

Sustainability

[In this section, a positive approach to tackling H@R could be mentioned]

Consideration of development proposals will also need to take into account the objective of securing the long term existence of any particular asset. In this context, enabling development of a type or form not normally considered acceptable in a particular location (site or buildings), may be considered where it has been proven that all other alternatives have been explored, and the development or use proposed is the only practical means of securing the sympathetic retention of the ~~feature~~.

When considering the demolition of an historic building or structure (whether statutorily listed or not) regard should be had to national planning guidance. In the case of proposals for demolition applicants should:

Comment [A21]: See comments made in the policy and reference to EH advice on Enabling Development and criteria which could be expanded on here

Comment [A22]: For this paragraph and list of points see comments on the policy on this – especially that it is about harm or loss of significance to all heritage assets; and the criteria reflecting the NPPF.

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- Demonstrate all reasonable efforts have been made to sustain existing uses, find viable new uses for the building or structure, market it, or otherwise preserve it in charitable or community ownership.
- Prove that the building is wholly beyond repair.
- Consider proposals for relocation where physically feasible.
- Include detailed and appropriate proposals for redevelopment that would produce substantial benefits to the community together with clear evidence the redevelopment will proceed.
- Where appropriate, provide some level of recording of the heritage asset prior to demolition

When considering small-scale renewable energy installations, energy efficiency and adaptation, careful and appropriate consideration of the impact of such works on [the significance of](#) heritage assets will be required. Any such works must be in accordance with policies contained within the LDF.

DRAFT