



STEVENAGE LOCAL PLAN EXAMINATION

STATEMENT BY HISTORIC ENGLAND

Matter 12: Natural and Historic Environment

Hearing Session on Thursday 23 February 2017

References:

Publication draft – January 2016, policy HO3: North of Stevenage (document LP1)

Collected representations made under Regulation 20 (document LP8)

Revised Housing Targets Consultation – statement of consultation (document LPD3)

Stevenage Local Plan First Consultation – statement of consultation (document LPD5)

Heritage Impact Assessment 2015 (document CH2)

St. Nicholas / Rectory Lane Conservation Area Management Plan Supplementary Planning Document 2012 (document CH9)

St. Nicholas / Rectory Lane Conservation Area Appraisal 2009

Stevenage Borough Council Executive Committee Paper of December 2007

Historic England's Advice Note 3: Site Allocations in Local Plans

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Introduction

1. In carrying out its role in protecting and managing the historic environment Historic England gives advice to local planning authorities on certain categories of applications affecting the historic environment. Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment.
2. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.
3. The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations in relation to the Publication Draft Local Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.
4. This statement addresses the Inspector's questions with regards to Matter 4 and site allocation to the North of Stevenage. In line with the requirements of the Framework, we challenge the soundness of policy HO3.
5. This hearing statement should be read alongside Historic England's comments submitted online at previous consultation stages in 2013 (document LPD5), 2015 (document LPD3) and 2016 (document LP8). For ease of reference we attach our full consolidated comments made in 2015 for the Revised Housing Targets Consultation as Appendix 1.

Inspector's Questions

6. We set out below our responses to the Inspector's questions in light of our historic environment role.

Inspector's Question 1. Has the Plan had regard to heritage assets, including the statutory test set out in S66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990?

6.1 Stevenage is documented in the Domesday Book although its origins are Anglo-Saxon, or possibly earlier. The oldest part of Stevenage is within the St. Nicholas / Rectory Lane Conservation Area which is the location of the original village settlement and contains Stevenage's only two grade I listed buildings. The buildings, landscape and townscape in this conservation area are important in documenting the history of Stevenage, its evolution, and growth.

6.2 As the *St. Nicholas / Rectory Lane Conservation Area Management Plan Supplementary Planning Document 2012* (document CH9), notes in paragraph 5.1 on page 11, *"The conservation area has been occupied since the Saxon period and perhaps earlier, however, it is not until the twentieth century that the area has undergone any significant development."* Despite modern development, as noted at paragraph 7.7 on page 21, *"One of the key features of this conservation area are the views into and from the area."* The *Conservation Area Appraisal 2009* expands on this at paragraphs 9.3 and 9.4 on page 39, *"The open fields to the north have been included within the conservation area as they are important to its setting; housing development within this area should be strongly discouraged. Any proposed new development should be carefully considered and the setting of the listed buildings, areas of archaeological potential, significant ancient footpaths and field boundaries must all be considered. Distant views of the settlement provide a context and are just as important as insular views from within the conservation area."*

6.3 These open fields, which were once associated with the Bury and Rooks Nest Farm, are key to the area retaining a sense of its historic rural identity and views from vantage points such as St Nicholas' Church (grade I) of the open fields to the north reinforce this. These views and vistas document the historic development of Stevenage itself, which is all the more remarkable given how close the area is to Old Stevenage and the heart of Stevenage New Town (see figures 3, 5, 7, and 8 in the *Conservation Area Appraisal* for historical maps). In fact, this important setting to both the listed buildings and conservation area acts as the gateway from Stevenage to its rural hinterland using historic footpaths (see paragraph 7.27 of the *Conservation Area Appraisal* on page 35). This continues to be used and appreciated by people in Stevenage with the network of footpaths around the landscape well-used. The *Stevenage Borough Council Executive Committee Paper* of December 2007 on the extension of the conservation area boundary sets out the importance of these vistas and routes to the conservation area, *"Vistas and throughfares are two important factors in this area's designation. The importance of the footpaths across the area known as Forster Country, and the views back towards the settlement, are features highlighted and supported by the...analysis."*

6.4 This landscape is known as Forster Country owing to its depiction in E. M. Forster's *Howards End* and Forster's factual descriptions of Rooks Nest House (grade I, in part owing to this literary connection), the inspiration for *Howards End*. It stands testament to the theme of encroaching urbanisation which Forster explored both through fiction in

Howards End and in *The Challenge of Our Time*, an essay published in *Two Cheers for Democracy* which documents his experience of the Stevenage New Town designation, “...the satellite town has finished them off as completely as it will obliterate the ancient and delicate scenery...I cannot free myself from the conviction that something irreplaceable has been destroyed, and that a little piece of England has died as surely as if a bomb had hit it.”. In fact his literature foresaw many of the challenges places like Stevenage would face and the conflicting needs of growth and preservation.

6.5 Although the setting of the conservation area has been compromised by modern development, this has been contained and an appreciation of the connection between the historic settlement and the rural landscape, as later documented by Forster, can be made from many vantage points throughout the conservation area. In particular, the view as you emerge from the churchyard; and also when you look back from the edge of the conservation area and you can see the old settlement encompassing Rooks Nest House (grade I), Rooks Nest Farm (grade II), St Nicholas’ Church (grade I), and The Old Bury (grade II*) amongst other listed buildings. We would note that though the views from Rooks Nest House and its gardens, documented by Forster in his appendix to *Howards End* on Rooks Nest House, are not available to the public at this time as it is in private ownership, these views still exist and should be preserved, with their juxtaposition against the more modern development of Chancellors Road additionally serving to encapsulate the philosophical conflict and process of urbanisation that Forster so eloquently documented.

6.6 Policy HO3 sets out a site allocation for the North of Stevenage which includes part of the St Nicholas / Rectory Lane Conservation Area. Owing to the topography of the proposed site allocation, both within and outside of the conservation area, any development that either is within the conservation area or is bordering the conservation area will cause considerable harm to both the significance of the conservation area, its setting, and the setting of the listed buildings within the conservation area given the historical value set out above. As such, Historic England finds the parcel of land within the site allocation and the conservation area, identified as ‘B’ in the Heritage Impact Assessment (document CH2), as being **unsound** under paragraph 182 on the basis of this part of the allocation being neither justified nor consistent with national policy as set out in Chapter 12 of the National Planning Policy Framework. Parcel of land ‘B’ neither meets the requirement in s66(1) of the 1990 Act to have special regard to the desirability of preserving the setting of listed buildings and any features of its historic interest, nor the requirement in s72(1) to preserve or enhance the character or appearance of a conservation area.

6.7 It therefore follows that development of the site allocation outside of the conservation area, identified as ‘A’ in the Heritage Impact Assessment, also is likely to have a considerable impact on the significance of the setting of both the conservation area and the listed buildings. The negative impact in terms of potential harm to the setting of the designated heritage assets is likely to be in terms of a significant intrusion to the setting. Further assessment of the potential impacts is necessary, as the Heritage Impact Assessment is not comprehensive (please see question 4 below) and the site

allocation will need to be justified in terms of its heritage impacts. If taken forward for allocation, appropriate mitigation measures will need to be put in place through policy HO3. In particular we would identify HO3 m ii, iii, iv, v, vi, and that as part of any development proposal the open space within the conservation area is retained as such and preserved and, where opportunities arise, enhanced.

Inspector's Question 2. Are the policies in accordance with the advice in the Framework in relation to historic environment?

6.8 No. Please see previous submissions and answer to Question 1 above.

Inspector's Question 3. Should the Areas of Archaeological significance in Policy NH9 include Norton Green?

6.9 Advice should be taken from the Hertfordshire County Council historic environment team as to whether this is appropriate.

Inspector's Question 4. There is a significant amount of local objection to the development of land referred to locally as 'Forster Country'. Has an assessment of the impact of development promoted through the Plan on the landscape character in this part of the Borough been considered? If so what were the findings?

6.10 A heritage impact assessment of a larger area than site allocation HO3 was made in November 2015. The assessment states that it follows the methodology set out in Historic England's *Advice Note 3: Site Allocations in Local Plans*, however, in our response dated 17 February 2016 we set out a full evaluation of the assessment.

6.11 The Heritage Impact Assessment concluded that development would cause less than substantial harm which, when weighed against the public benefits of both the housing and Stevenage's requirement of any developer that the remaining open space be retained by legal agreement or transfer to the Borough Council, would be acceptable harm.

6.12 Historic England disagrees. We believe that the heritage assessment significantly underestimates the harm to the significance of the conservation area, as set out in our response to question one above, and is deficient in not considering the harm to the significance of the setting of the only two grade I buildings in Stevenage – St Nicholas' Church and Rooks Nest House and to the conservation area itself. Historic England disagrees with the assessment's conclusion that whilst the inclusion of a parcel of land within the conservation area would affect the character and appearance of that part of the conservation area, it was not fundamental to the significance of the conservation area as a whole for the reasons set out in question one above and our previous submissions.

Please see also our Matter 4 Hearing Statement.

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Historic England

Appendix 1

Historic England's Response to Revised Housing Targets Consultation 23 July 2015

SCHEDULE OF COMMENTS FROM HISTORIC ENGLAND ON THE STEVENAGE LOCAL PLAN REVISED HOUSING TARGETS CONSULTATION (including Sustainability Appraisal), 23 July 2015

(Comments submitted online, but collated here for internal reference)

Revised Housing Target Options

Question 1 asks which housing option the Borough Council should work towards in terms of the number of new homes between 2011 and 2031. Option (a) "Maintain the Green Belt" suggests 5,300 in total and was previously the Council's preferred figure in the 2013 consultation albeit the spatial distribution is different. Option (b) "Borough capacity" suggests 7,600 in total and is now the Council's preferred approach based on new information and further assessment work since 2013. We do not wish to comment on how the numbers have been derived, but there will be historic environment impacts from both options.

Option (a) comprises the maximum number of homes that could be accommodated within the existing Green Belt boundaries of the town. This represents an increase in the number of new homes within the existing town (compared to Option (a) from the 2013 consultation) with potential harm to heritage assets in locations such as conservation areas. The Sustainability Appraisal (SA) considers short-term positive effects for heritage from this option, but longer term uncertainty, presumably as pressure increases to find sites within the Green Belt boundary. We would advise that selection of sites would need to be justified in terms of any heritage impacts, with negative impacts minimised.

Option (b) comprises the number of homes that could be reasonably accommodated within the borough boundary, including sites in the Green Belt. The impact on heritage assets within the existing town would potentially increase given that a further 900 homes would need to be built compared to Option (a). There would also be impact on heritage assets on the edge of the town and beyond into the surrounding countryside, including at Bragbury End in the south-east and Symmonds Green in the west, but especially on the north side of the borough. As stated in our response to the 2013 consultation, we are concerned to see that this option could result in development within the St Nicholas and Rectory Lane Conservation Area based on the diagram on pages 16 of the consultation document. There is a large area of open countryside within this conservation area to the west of Weston Lane (sometimes referred to as Forster Country) which could be affected. Paragraph 2.59 states that the Council will seek to protect the openness of the countryside closest to the church and conservation area, but it is not clear what this means in practice. The SA considers that land within the conservation area would not be

required under this option, but it cannot be said for certain and there could be impact on setting regardless (hence the SA records an uncertain impact on heritage).

We welcome further discussion with the Borough Council regarding Option (b) given that this is the preferred approach and is likely to impact on the above conservation area and several listed buildings. Such discussion ought to involve North Hertfordshire District Council on the basis that they are considering allocating land immediately to the north of the borough boundary next to the conservation area (we have commented on their proposed allocation as part of our response to their 2015 Preferred Options consultation). This could form part of the obligations under the duty to cooperate.

We note that the SA considers two reasonable alternative housing targets of 6,400 and 9,000 homes. The impact on heritage assets is similar to Option (b) in the case of 6,400, and more negative in the case of 9,000 (which assumes that land within the above conservation area would be developed). We broadly concur with the findings of the SA, and welcome the mitigation measures relating to heritage and conservation (i.e. selecting sites which minimise impacts and ensuring the plan has appropriate policies).

The Green Belt

Question 2 asked whether the existing Green Belt should be maintained or rolled back within and beyond the borough boundary to accommodate development needs. The document notes that there are similarities between Questions 1 and 2, although many impacts of Green Belt change are secondary. The Council's preferred approach is to release land within the borough up to 2031 and work with neighbouring councils to identify land that might be needed beyond that.

The impacts on the historic environment are similar to Question 1. Option (a) "Maintain the Green Belt" would safeguard heritage assets on the edge of town, but potentially increase pressure on heritage assets within the town as development is restricted to non-Green Belt sites as the Sustainability Appraisal (SA) notes. Options (b) and (c) have similar impacts, as in both cases land within the Green Belt is released that could impact on heritage assets (Option (b) is solely within the borough, Option (c) is potentially beyond). The SA notes that impacts on heritage are uncertain until sites are selected, although given the relatively limited extent of Green Belt within the borough, any release of land on the north side of town would have implications for the St Nicholas and Rectory Lane Conservation Area (simply through development within its setting). As with paragraph 2.59, paragraph 3.24 seeks to protect the openness of the conservation area, but does not explain how. Again, we would welcome further discussion with the Council (and others) regarding Option (c) given it is the preferred approach.

Sustainability Appraisal and other general comments

Our comments on the two consultation questions refer to the SA supplementary report in terms of its appraisal of individual options. However, as stated previously in our response to the SA Scoping Report and the 2013 consultation, the objective on the historic

environment (No. 7) does not cover all aspects of the historic environment as defined by the NPPF. It only refers to areas and buildings (rather than the more all-encompassing term “heritage asset”) and historic and archaeological interest (missing our architectural interest which can form part of the significance of heritage assets). It also only refers to those features that area designated, implying that those which are not designated are of no importance (when in fact, they could be of equal importance to designated heritage assets; see paragraph 139 of the NPPF for example). We feel the SA Objective would be better worded as follows:

“Preserve and enhance heritage assets recognised for their archaeological, architectural, and/or historic interest and protect their settings.”

The decision-making questions for SA Objective 7 also need amending to reflect the above issues.

In terms of the sustainability indicators in Appendix A, the data source for listed buildings, scheduled monuments and heritage at risk is now Historic England.

Finally, please note that Historic England has published a good practice advice note on Local Plans, which can be found on our website at:

<http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>

We have also published a draft advice note on site allocations in local Plans, which is out to consultation until 2 August. It can be found online at (and we would welcome any comments on the draft):

<http://historicengland.org.uk/about/what-we-do/consultations/guidance-open-for-consultation/>

Tom Gilbert-Wooldridge
23 July 2015

