

Policy DS NEW3. Former Police Headquarters (HQ), Woodcote House, Leek Wootton - Proposed residential allocation for 115 dwellings

Matter 7d. Proposed housing site allocations; Growth Villages and Hockley Heath

Issue. Whether the proposed housing allocations at the Growth Villages and Hockley Heath are justified, effective and consistent with national policy.

The Inspector has raised a number of specific questions in relation to this and other proposed allocations. The following are considered the most relevant to the heritage matters to which this Statement of Common Ground (SOCG) primarily relates.

- 1. In addition to housing provision, are there other benefits that the proposed development would bring?*
- 2. What are the potential adverse impacts of developing the site? How could they be mitigated?*
- 3. Is the site realistically viable and deliverable?*

NB The Inspector has requested that in responding to the above the Council should address key concerns raised in representations.

The key concerns made by Historic England were as follows.

- 1. In principle, the proposal provides a welcome opportunity to restore this Grade II Listed Building and its setting. However it has not been demonstrated, by the provision of evidence, that 115 new homes can be accommodated on the site in accordance with the DS NEW3 policy criteria, and without causing significant harm to the setting of the Listed Building its associated park/garden and the adjacent Conservation Area.*
- 2. Evidence needs to be provided to illustrate how the quantum of development might be delivered without causing an unacceptable level of harm to the setting of the affected heritage assets.*
- 3. Is the quantum of development required to deliver historic environment improvements? Historic England Guidance on Enabling Development may help to inform any viability issues that may arise.*
- 4. In making its views Historic England had regard to: national policy (the NPPF), legislation (Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and national guidance (Planning Practice Guidance; Historic Environment Good Practice Advice in Planning Note 1 GPA 1 - The Historic Environment in Local Plans(March 2015); Historic Environment Good Practice Advice in Planning Note 3 GPA 3 - The Setting of Heritage Assets(March 2015) and The Historic Environment and Site Allocations in Local Plans Historic England Advice Note 3 (October 2015).*

5. *It is appreciated that there is an expectation that the Local Plan enables the delivery of sustainable development in accordance with the policies of the NPPF, with one of its core dimensions of sustainable development being the protection and enhancement of the historic environment.*

The following SOCG seeks to clarify those matters where agreement has been reached; where a common position is accepted; and to highlight the particular issues of concern that remain.

Statement of Common Ground between Warwick District Council (WDC), Place Partnership Ltd (on behalf of the landowner) and Historic England (HE). 02 November 2016

<p>Inspectors question no. 1. <i>In addition to housing provision, are there other benefits that the proposed development would bring?</i></p>	<p>WDC, Place Partnership Ltd and HE agree that the proposed removal of unsightly post-war development from the site, car parking from the front of the House and the positive conservation initiatives provide a welcome opportunity to better reveal the significance of this Grade II listed building in accordance with NPPF paragraph 137.</p> <p>In addition to the aforementioned benefits to the historic environment, there will be public access to this historic site and its open spaces, including The Lunch woodland and Lakes. This will provide for public enjoyment of the heritage assets and recreational opportunities, which are wider social and cultural benefits. There is also potential for the existing pavilion, a curtilage listed building, to be used as a multi-purpose community facility.</p>
<p>Inspectors question no. 2. <i>What are the potential adverse impacts of developing the site? How could they be mitigated?</i></p>	<p>Although it is acknowledged by WDC, Place Partnership Ltd and HE that there would be harm to the significance of the locally listed park and garden, and to the setting of the main House, through the development of currently open land within the estate, this harm can be minimised by the suggested commitments below.</p> <p>In addition, it is agreed by WDC, Place Partnership Ltd and HE that the degree of harm is less than substantial in the terms of the NPPF and consequently that the policy tests in paragraph 134 are engaged, namely that harm should be weighed against the public benefits of the proposal.</p>
<p>Related concern expressed by HE - <i>Can it be demonstrated that 115 new homes can be</i></p>	<p>Policy DS NEW 3 requires the conservation and enhancement of the affected heritage assets. It is accepted that to accommodate 115 new homes on the site there may be pressure to identify a material area of parkland to the far</p>

<p><i>accommodated on the site in accordance with the DS NEW3 policy criteria, and without causing significant harm to the setting of the Listed Building its associated park/garden and the adjacent Conservation Area.</i></p>	<p>east of Woodcote House for development (within the setting of the Listed Building). Although this would cause a degree of harm this can be minimised and compensated by the conservation gains set out below resulting in a net gain to the significance of the heritage assets affected.</p>
<p>Related concern expressed by HE -</p> <p><i>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, the plan should consider how that harm might be reduced and any residual harm mitigated (NPPF para 152). 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.</i></p>	<p>WDC, Place Partnership Ltd and HE agree that less than substantial harm to the designated heritage assets can be considered against enhancements as described, particularly the removal of unsightly post-war development from the site, car parking from the front of the House and from within the former kitchen garden walls and stable range, telecommunications mast and existing large and functional buildings. Moreover harm can be reduced and mitigated by the on-going masterplanning work and design response at the planning application stage, including through consideration of the distribution of development within the site, re-creation of new areas of gardens in place of parking, and supplementary landscaping. The landowner is committed to the on-going masterplanning, and subsequent planning applications, continuing to be undertaken and prepared in close co-operation with WDC, HE and other interested parties including the Parish Council.</p>
<p>Related concern expressed by HE -</p> <p><i>It is expected that evidence is taken into account when considering the impact of the proposal on heritage assets, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal (NPPF para 129).</i></p> <p>Related to Inspector's question no 3 - Is the site realistically viable and deliverable?</p>	<p>WDC, Place Partnership Ltd and HE agree that evidence has been gathered to understand the historic significance of the site, its setting and the features and structures within.</p> <p>This allocation will facilitate improvements to this historic site by the removal of unsightly extensions and additions and their replacement with more contextual development. A Viability Appraisal has been undertaken which demonstrates that development is viable taking account of policy requirements and costs of development and mitigation, including conversion of Woodcote House. An enabling case is not being advanced. However, the long term viability, and thus sustainability, of the development, needs to be taken into account, in particular residents' liabilities for maintenance of extensive open spaces and formal gardens, including The Lunch woodland and Lakes.</p>

<p>Related concern expressed by HE -</p> <p><i>The LA needs to demonstrate that great weight has been given to the conservation of the heritage assets (NPPF para 132) and a recognition of the legislative expectation that special weight is paid to the desirability of preserving the setting of the Woodcote House.</i></p>	<p>The proposed allocation, policy and associated evidence demonstrate how the affected heritage assets have informed the submission, and the weight that has been applied to conserve and enhance their significance. It is agreed by WDC, Place Partnership Ltd and HE that less than substantial harm caused by development within the parkland can be considered against the benefits described. Accordingly, the local authority can demonstrate that, in accordance with the provisions of paragraph 132 of the NPPF, great weight and due regard has been given to conserving the significance of the affected heritage assets.</p>
<p><i>To accord with NPPF paragraph 134, a key test will be for the Local Authority to weigh the harm against any relevant public benefit.</i></p>	<p>WDC, Place Partnership Ltd and HE agree that less than substantial harm to the designated heritage asset is likely to arise as a consequence of the form of development anticipated by the allocation and illustrative material submitted as evidence. Such less than substantial harm can be considered against the following public benefits:</p> <p>Conservation benefits:</p> <ul style="list-style-type: none"> • Removal of the highly insensitive 1960s extension to Woodcote House. • Removal of unsympathetic extensions to the former stable range, and replacement of parking within the former kitchen garden walls with a sympathetic development that, for example, reflects the glasshouses that historically stood on the site, set within a formal garden. • Reduction in parking and reinstatement of lawn to the forecourt of Woodcote House, improving views on the approach to, and from the east of, the House. • Improvement of vistas, including through the removal of the telecommunications mast and reduced massing, with existing large buildings, for example the Communications Centre, replaced by modest dwellings, thereby increasing the dominance of Woodcote House. • Retention of landscape features, including open space and the woodland, which contribute to the setting of Woodcote House, and reinforcement of existing landscape features with additional structure

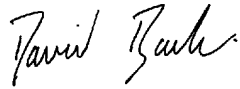
	<p>planting, including along the historic boundary of The Paddock to further soften views and assist transition from parkland to built form, and along Woodcote Lane, with built development also restricted along the boundary, in order to retain the strong sense of enclosure on this approach to the Conservation Area.</p> <p>Wider public benefits:</p> <ul style="list-style-type: none"> • Securing optimum viable use of Woodcote House and its setting, including the formal gardens, to secure its long term conservation; • Delivery of housing, including affordable housing ; • Improvements to the management and maintenance of open spaces, including The Lunch woodland and Lakes; • Social and cultural benefits from public access to this historic site and its open spaces, which will provide for enjoyment of the heritage assets and recreational opportunities; • Potential re use of the existing pavilion as a multi-purpose community facility; and • Access improvements.
<p><i>How the potential adverse impacts of developing the site can be mitigated?</i> With particular regard to The relationship of development to the Conservation Area.</p>	<p>The landowner's indicative Masterplan illustrates housing development parallel to Woodcote Lane. Woodcote Lane provides a 'rural' entrance to the village and makes a positive contribution to the setting of the Conservation Area. WDC, Place Partnership Ltd and HE agree that with care an appropriate design response can minimise any harm ensuring the character or appearance of the Conservation Area is maintained.</p>
<p><i>How the potential adverse impacts of developing the site can be mitigated?</i> With particular regard to The impact on the locally listed historic park and garden (non-designated heritage asset) (NPPF para 135). And The impact on the setting and significance of Woodcote House, a Grade II listed building.</p>	<p>In addition to the redevelopment of existing post-war additions, all parties accept that the allocation of this site to accommodate 115 new dwellings may require a redevelopment of historic parkland associated with the main house, comprising a material area to the far east of Woodcote House All parties agree that this parkland contributes to the significance of the main House and is within its curtilage, although it has been compromised by for example Broome Close, a free standing and extensive post war residential property at the eastern end of the park.</p>

	<p>The land owner has considered how that harm might be reduced (mitigated) in accordance with NPPF para 152. It is considered that harm may be limited by the following:</p> <ul style="list-style-type: none"> • Consideration of the distribution and density of development within the site; • Strategic landscaping; • Careful layout that ensures built form recedes in views from the House, and sensitive scale and massing of new homes to breakdown volume of built development; and • Full regard to preserving the setting of the nearby Conservation Area. <p>It is considered the removal of the car park to the front of the main house and its replacement with a more suitable domestic garden layout will enhance the locally listed park and garden closest to the main house, and thus short range views. This will better reveal its significance, as will removal of the unsightly and large 1960s extension, and wider large and functional buildings and the telecommunications mast, together with sympathetic conservation of curtilage listed building.</p> <p>Such measures demonstrate the weight applied to the conservation of the affected heritage assets and improvements will form part of the Local Plan positive strategy for the historic environment in accordance with NPPF para 126.</p>
<p>Additional matters clarified to assist the case for the allocation.</p>	
<p>What is the status of the Masterplan provided by the land owner?</p>	<p>The land owner has provided an indicative and illustrative Masterplan (and associated technical reports) to demonstrate how 115 new homes may be accommodated. It has not as yet been formally agreed by the LA, as will be required by Policy DSNEW3, or HE. The masterplanning work is on-going, and will continue in close co-operation with WDC, HE and other interested parties.</p>

Conclusion

In light of the above, all parties accept that the appropriate national policy tests have been appropriately applied and the allocation and associated policy does not compromise the Soundness of the Plan. Whilst less than substantial harm to the setting of the main house may arise this can be minimised, mitigated and offset by extensive conservation enhancements and public benefits.

Signed on behalf of Warwick District Council



Date: 04 November 2016

Signed on behalf of Place Partnership Ltd



..... Date: 02 November 2016

Signed on behalf of Historic England

A handwritten signature in black ink, appearing to read 'Rohan Torkildsen', with a long horizontal flourish extending to the right.

Rohan Torkildsen, Historic England Planning Adviser, 3 November 2016.