

Statement of Common Ground Between WDC & Historic England with Joint Highway Comments from WDC & WCC

Plan ref	Page no.	Relevant extract of the Draft Warwick Local Plan	Historic England (HE) comment	Recommendation to ensure the Plan accords with tests of soundness	Action
1.54 Objectives	12	<i>Protect and enhance high quality landscapes and important heritage and natural assets, ensuring that where adaptation is needed, this is done in a sensitive way.</i>	HE welcomes the principle of this sub objective however suggests a minor clarification to ensure consistency with national planning policy.	The following additional text is suggested. ...in a sensitive way <u>appropriate for their significance.</u>	Agreed
2.8 DS3	15	DS3 : Supporting Sustainable Communities <i>d) protecting areas of significance including high quality landscapes, heritage assets and ecological assets;</i>	Welcome/support/endorse	N/A	N/A
3.135 CT7	72	<i>Development at Warwick Castle or Warwick Racecourse ... will only be permitted where it is brought forward in line with an approved Masterplan.</i>	EH welcomes the principle of the initiative. Due to the national importance of the Castle and the intended role of the masterplan in shaping the future of the site, HE would welcome the opportunity be a partner in its preparation. If the masterplan is to be a development plan should its preparation be subject to the same rigor and discipline of a local plan?	The following additional text is suggested. To support and inform the masterplan HE and other key local groups will be invited to participate in its preparation.	Agreed

3.136	73	<i>It is a Grade 1* listed building set within Grade 1 landscaped grounds.</i>	It should also be recognised that Warwick Castle is also a Scheduled Monument.	<p>The following additional text is recommended.</p> <p>It is a Grade 1* listed building and <u>Scheduled Monument</u> set within Grade 1 landscaped grounds.</p>	Agreed
4.40 H4	81	H4 Securing a Mix of Housing <i>d) sites where particular house types and/ or building forms may be required in order to sustain or enhance the setting of a heritage asset;</i>	Welcome/support/endorse	N/A	N/A
5.0 SCO	104	Overarching Policy SCO: Sustainable Communities. <i>New development should be high quality... It is also important that new development protects and enhances the historic, built and natural features that make Warwick District a great place. To achieve this the development should:</i> <i>k) protect, and where possible enhance, the historic environment and particularly designated heritage assets such as Listed Buildings, Registered Parks and Gardens and Conservation Areas, and;</i>	Welcome/support/endorse	N/A	N/A

5.103	133	<p>CC2 Planning for Renewable Energy and Low Carbon Generation.</p> <p><i>Proposals for new low carbon and renewable energy technologies (including associated infrastructure) will be supported in principle subject to all of the following criteria being demonstrated:</i></p> <p><i>c) the design would not result in substantial harm to any adjacent heritage assets and local areas of historical and architectural distinctiveness;</i></p>	<p>As drafted this criteria is inconsistent with the NPPF. Its core planning principles in para 17 mention both the Government's desire to encourage the use of renewable resources and the need to 'conserve heritage assets in a manner appropriate for their significance'.</p>	<p>The following alternative text is suggested to accord with the NPPF and paragraph 5.107 in the Explanation to the Policy.</p> <p>c) the design will ensure that heritage assets including local areas of historical and architectural distinctiveness are conserved in a manner appropriate for their significance;</p>	Agreed
5.29	113	<p><i>“However, there are significant issues associated with transport that this Plan needs to address. These include safety, air quality, impact on climate change, congestion and the impact that transport infrastructure can have on the historic environment and community cohesion. These impacts need to be managed carefully through this Plan so that the achievement of an efficient and</i></p>	<p>Welcome/support/endorse.</p> <p>However it is not clear that the implications for the historic environment arising from major development to the south of Warwick have been fully addressed in accordance to such a commitment.</p>	<p>Prepare evidence to appreciate the implications for the historic environment of the strategic allocations to the south of Warwick to inform the principle of development and appropriate mitigation.</p>	See attached

		<i>effective transport network is not achieved at the expense of health, the environment and community well-being.</i>			
TR1	113	Transport Policy TR1 Access and Choice	Mindful of the commitment in paragraph 5.29 and 5.41 it is of concern there is no criteria in this policy to ensure transport infrastructure responds positively to the historic environment.	Additional criteria - Respond positively to the context of the historic environment, including townscapes and landscapes, ensuring locally distinctive areas are conserved in a manner appropriate to their significance.	See attached
5.41	115	<i>All highway infrastructure will be required to comply with national guidance and standards set out in Manual for Streets, Manual for Streets 2 - wider application of the principles, the Design Manual for Roads and Bridges and any subsequent updates to these documents. These provide guidance to applicants on assessing the overall transport requirements for new developments, the types of transport improvements likely</i>	Welcome/support/endorse. However it is not clear whether such guidance has been applied to inform an understanding of the implications for the historic environment arising from major development to the south of Warwick.	Apply <i>Manual for Streets and the Design Manual for Roads and Bridges</i> , at this stage of the Plan, to inform an understanding of the implications for the historic environment of proposed development to the south of Warwick to inform the principle and potential mitigation.	See attached

		<i>to be justified, the layout and design of new accesses and the procedures and agreements which will be used.</i>			
5.44		<i>Transport Assessments, prepared in line with the Department for Transport's Guidance on Transport Assessment, are required alongside planning applications for major development to demonstrate that they positively contribute to the objectives of this Plan. Transport Assessments will be required for all large developments in line with Appendix B of the Guidance on Transport Assessment (or any subsequent updates) produced jointly by the Departments for Transport and CLG.</i>	Whilst a commitment to undertake such an assessment is welcomed it needs to take place at this stage, rather than when a planning application is submitted to inform the principle of the strategic allocations to the south of Warwick.	The Transport Analysis Guidance (DOT May 2014) including the methodology for assessing townscape, landscape and the historic environment, should be applied at this stage of the Plan to inform an understanding of the implications of the strategic allocations to the south of Warwick and the appropriate mitigation.	See attached
TR2	116	Policy TR2 Traffic Generation. <i>Any development that results in significant negative impacts on health and wellbeing of people in the area as a result of pollution, noise or vibration</i>	The policy fails to address the appropriate response arising from development that results in increased traffic generation potentially harming the significance of the Districts historic environment.	Add Development will not be approved that results in the generation of a significant increase in traffic and results in associated measures to	See attached

		<i>caused by traffic generation will not be permitted unless effective mitigation can be achieved.</i>		facilitate this increase in traffic, which harms the significance of the historic environment, unless appropriate mitigation can be achieved.	
DS11	24	<p>DS11 Allocated Housing Sites</p> <p>H01 Land West of Europa Way 1,190 homes</p> <p>H02 Land south of Harbury Lane 1,505 homes</p>	<p>The Plan and its evidence base suggest that as a consequence of these developments significant additional traffic will be generated and pass through the historic town of Warwick.</p> <p>Phase 4 Strategic Transport Assessment (March 2014) (STA4) suggests few traffic management measures are required to accommodate such an increase in traffic and would conserve the significance of the historic environment as a consequence.</p> <p>Whilst this is a better proposition than previously suggested it remains unclear, a) how the historic environment was considered, as STA4 makes little or no reference to the</p>	<p>Can the local authority assure Historic England that :-</p> <ul style="list-style-type: none"> -the direct, indirect and cumulative effects of proposals on the historic environment have been appreciated? -that there has been an assessment in accordance with the Transport Analysis Guidance (DOT May 2014) including the methodology for assessing townscape, landscape and the historic environment? -that the principles of good practice in <i>Manual for Streets</i>, and the <i>Design Manual for Roads and Bridges</i> have been 	<p>See attached.</p> <p>Historic England will be involved in the detailed layout and design of these sites and can be assured that the district council will ensure that the historic environment is taken into account</p>

			<p>historic environment, and b) what are the implications of the additional traffic on levels of congestion and as a consequence the character and setting of the town.</p> <p>Might an increasing demand to travel through the town provide the opportunity to enhance the public realm and streets in the town consistent with NPPF paragraphs 137, 156 and part of the Plans positive strategy for the conservation of the historic environment (NPPF paragraph 126)? I understood this was an objective of the former Warwick Area Action Plan now apparently no longer being prepared.</p>	<p>applied?</p> <p>If not the evidence base should be complimented to ensure that the local plan is based upon adequate, up-to-date evidence; without which, the local authority will not be able to assert that the objectives for sustainable development have been understood nor as a consequence that the objectively-assessed development needs of the area can be met in a manner which will accord with the presumption in favour of sustainable development (NPPF para 14). One of the core dimensions of sustainable development being the protection and enhancement of the historic environment (NPPF para 7).</p> <p>The evidence base will help to inform what the local plan needs to do in order to deliver a positive strategy for the</p>	
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				<p>conservation and enhancement of the historic environment.</p> <p>A failure to address such concerns may cause the Plan to be considered unsound.</p>	
DS11	24	<p>DS11 Allocated Housing Sites</p> <p>HO6 Thickthorn, Kenilworth 760 homes, 8ha employment</p>	<p>The development affects Thickthorn Manor and the Glasshouse Roman Settlement. There is no evidence to demonstrate a proper assessment has been undertaken to inform the principle of development, nor, without prejudice, the critical design response (mitigation).</p> <p>It should be appreciated that due to the former Roman occupation of the site there also needs to be an assessment of the likelihood that currently unidentified archaeology, potentially of national importance, will be discovered (NPPF para 169).</p> <p>Without such an assessment the local authority is unable to assert that the objectives for sustainable development have been understood and therefore cannot say whether the</p>	<p>To accord with NPPF paragraphs 158 and 169, the local authority should gather evidence to assess the significance of the affected heritage assets (including by development affecting the setting of either heritage asset).</p> <p>I would strongly recommend the methodology in The Setting of Heritage Assets (Historic England 2011) is used.</p> <p>The Assessment should also be used to predict the likelihood that currently unidentified archaeology, will be discovered in the future – the Roman settlement is highly likely to be more extensive</p>	<p>This has been done and the contents of the assessment agreed with Historic England</p> <p>Additionally, Historic England will be involved in the detailed layout and design of these sites and can be assured that the district council will ensure that the historic environment is taken into account</p>

			<p>objectively assessed development needs of the District will be met or not in accordance with the presumption in favour of sustainable development. One of the core dimensions of sustainable development being the protection and enhancement of the historic environment.</p> <p>It is expected that evidence has been 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).</p> <p>There appears to be a failure to demonstrate that great weight has been given to the conservation of the heritage assets (NPPF para 132) nor a recognition of the legislative expectation that special weight is paid to the desirability of preserving the setting of the affected Manor. The Ancient Monument and Archaeological Areas Act gives provision for the protection of the scheduled Roman Settlement.</p>	<p>than the scheduled area.</p> <p>It should then be applied to inform the principle, location, form and capacity of any strategic allocation.</p> <p>Development will be expected to avoid or minimise conflict between any heritage asset's conservation and any aspect of the proposal.</p> <p>Consequently Historic England recommends that the Plan should not progress until this strategic matter is resolved.</p>	
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			<p>The significance of a heritage asset derives not only from its physical presence but also from its setting – the surroundings in which it is experienced.</p> <p>Consequently Historic England considers the Plan is inconsistent with the provisions of the NPPF and therefore unsound.</p> <p>Historic England has raised this concern formally on more than one occasion.</p>		
H19	25	<p>DS11 Allocated Housing Sites</p> <p>Baginton - Rosswood</p> <p>35 new dwellings adjacent to Baginton Conservation Area</p>	<p>The evidence base considers that development would be acceptable if certain design principles were followed to ensure the setting of the conservation area is protected. Consequently the essential strategic design principles should be considered for inclusion in the Plan.</p>	Consider including the critical design principles for the site in the Plan.	In allocating the site, we do not consider it necessary to go into this level of detail when it can be dealt with through a planning application and by pre-application discussions between the developer and the Council
H34	25	DS11 Allocated Housing Sites	The NPPF requires Local Plans, as a	The following comments by	Following HEs recent

		<p>Housing allocation at Leek Wootton</p>	<p>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 with 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 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 of a site.</p> <p>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</p>	<p>Historic England (dated 4 Oct 2016) on this proposed allocation are made having regard to national policy, legislation and the evidence provided by the Council (notably the Woodcote House Setting Assessment (WDC 2015) and by the prospective developers (recently submitted Aug/Sept 2016).</p> <p>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>Historic England notes the intention to subdivide the house to form several apartments and to replace aforementioned post war</p>	<p>comments, the Council is discussing an appropriate response with the prospective developers team and will further update the Inspector in due course.</p>
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			<p>proposal (NPPF para 129)</p>	<p>development with new housing to the north. Consideration of the details associated with such aspects of development can be assessed at a later stage when further information is submitted with any application for LB Consent and Planning Permission.</p> <p>New housing development is proposed parallel to Woodcote Lane which provides a 'rural' entrance to the village and makes a positive contribution to the setting of the Conservation Area. In accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990, one needs to be assured that special attention has been paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area.</p> <p>The parkland between the</p>	
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				<p>house and the South Lodge clearly forms part of the historic grounds to the Listed Building, is a component of the formal setting and contributes positively to its significance. Proposed residential development in this part of the site would remove approximately 1/3 of this historic open landscape and therefore cause harm to the significance of the Listed Building.</p> <p>The Local Authority will need to demonstrate that great weight has been given to the conservation of the Listed Building in accordance with NPPF paragraph 132 and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990.</p> <p>To accord with NPPF paragraph 134, a key test will be for the Local Authority to weigh the harm (as described</p>	
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				above) against any relevant public benefit. It may be helpful to clearly set this out for the Inspector's consideration.	
BE2	108	Developing Strategic Housing Sites – development briefs	To ensure development briefs are prepared having due regard and consideration of the historic environment an additional criterion is recommended.	Add - the historic environment	Agreed
	145	Historic Environment Section	Historic England welcomes the inclusion of this specific section and the components of a positive strategy for the conservation of the historic environment. However to accord with the provisions of the NPPF the following modifications are recommended.		
HE1	146	HE1 Protection of Statutory Heritage Assets	It is unclear why the term <i>Statutory Heritage Asset</i> is used as the policy clearly only relates to listed buildings.	Rename Policy, Listed Buildings	Agreed
HE2	147	HE2 Protection of Conservation Areas	Again, the title of the policy is perhaps misleading as the Policy is about managing change within conservation	Rename Policy, Conservation Areas	Agreed

			areas involving protecting and enhancing.		
HE2	147	HE2 Protection of Conservation Areas	The components of this policy should be set within an overriding policy statement as some of the policy expectations appear rather exclusive.	At the start of the policy consider including the following Development within or which would affect the setting of a conservation area will be expected to preserve or, where appropriate, enhance those elements which contribute to their special character or appearance.	Agreed
HE4	150	HE4 Protecting Historic Parks and Gardens	This policy paraphrases NPPF paragraph 132+, setting out how the degrees of harm to significance should be considered. As these are generic national policy criteria for all designated heritage assets it might be argued that all the Warwick Local Plan's HE policies should also refer to such a statement. Alternatively the local authority might consider including the following paragraph in the introductory text of the Historic Environment Policy	The following additional text is suggested for the introductory part of the historic environment section. <i>Any harm to the significance of a designated or non-designated heritage asset, or their loss, must be justified. Proposals will be weighed against the public benefits of the proposal; whether it has been demonstrated that all reasonable efforts have been</i>	Agreed

			<p>section, and a revised Policy HE4.</p> <p>Again, a revised policy title is also suggested.</p>	<p><i>made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.</i></p> <p>HE4 Historic Parks and Gardens</p> <p><i>Development will be expected to conserve the design, character, appearance, structure, principal components and setting of the Districts historic parks and gardens on the national and local registers as defined on the Policies Map.</i></p>	
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Proposed Modifications Consultation Response

<p>Policy DS NEW 1 Directions for Growth South of Coventry (Westwood Heath, Kings Hill) New paragraph 1.09</p>	<p><i>Development proposals for the strategic sites will be expected to address the following as a minimum: Proposals for development must respond positively to natural and heritage assets; wherever possible and viable, development should enhance the settings of such assets.</i></p> <p>The emphasis of the caveat "<i>wherever possible and viable</i>" is inconsistent with the NPPF and should either be deleted or replaced with "where appropriate" (NPPF Glossary – definition of Conservation).</p>	<p>Agreed</p>
<p>H42 Westwood Heath 425 dwellings</p>	<p>The Local Plan Site Allocations Historic Environment Assessment Statement 2015 confirms that the proposed allocation site at Westwood Heath would have a "moderate adverse impact" on the setting of non-designated medieval remains and the overall archaeological potential of the site. Consequently Historic England recommends that the Statement's suggested mitigation is referred to within the Local Plan - perhaps an abbreviated version of the below .</p> <p><i>- a staged programme of investigation and mitigation, including pre determination field evaluation to establish the presence, extent and significance of any unrecorded archaeological remains within the proposed allocation site boundary. The results should influence the design and layout of any development proposals including contributing to the sites green infrastructure provision.</i></p>	<p>Agreed</p>
<p>H43 Kings Hill Lane</p>	<p>The Local Plan Site Allocations Historic</p>	<p>Agreed, but the detail will be included within</p>

<p>1800 dwellings</p>	<p>Environment Assessment Statement 2015 demonstrates the likely harm that would be caused by future development to the significance of the Kings Hill Deserted Mediaeval Village (Scheduled Monument) unless an informed strategic design response is pursued. Historic England recommends that the Local Plan include specific reference to the effected heritage assets within the site and the necessary strategic design response to mitigate/avoid harm.</p>	<p>a planning application and it is at this stage that these comments will be taken into account. Historic England is a consultee and will be involved in the development of the detailed design of the site taking into account the heritage assets which are in the area The Council's consultant has prepared a report which meets the requirements of HE with regard to assessing the effects of development on the heritage assets.</p>
<p>Policy DS NEW3 Former Police Headquarters, Woodcote House 115 dwellings</p>	<p>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. 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. Historic England Guidance on Enabling Development may help to inform any viability issues that may arise.</p>	<p>A Masterplan is in preparation for this site which will address issues around delivery of the development taking into account the heritage assets whilst delivering the quantum of development forecast for the site. Historic England is a consultee</p>
<p>H19 Baginton – Land north of Rosswood Farm. Extended area. 80 dwellings</p>	<p>The Additional Local Plan Site Allocations Historic Environment Assessment Statement (January 2016) highlights the significant impact of future development on the setting of the Conservation</p>	<p>See H19 above</p>

	<p>Area. From the report it is not clear if harm can be avoided. WDC should clarify this matter to demonstrate that special attention has been paid to the desirability of preserving or enhancing the character or appearance of the adjacent Conservation Area in accordance with S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>How might development respond to ensure the Conservation Area's significance is sustained and how should appropriate and effective safeguards (if they exist) be reflected in the Local Plan itself?</p>	
<p>H44 North of Milverton 250 dwellings</p>	<p>It is not apparent whether evidence been gathered and applied to inform this allocation and The Additional Local Plan Site Allocations Historic Environment Assessment Statement (January 2016) highlights the potential impact of future development on the setting of the Leamington Spa Conservation Area.</p> <p>The Local Plan should set out the desired design approach to demonstrate a positive approach, and great weight, to the conservation of heritage assets in the delivery of sustainable development, one of the core dimensions being the protection and enhancement of the historic environment (NPPF Para 132); and that special attention has been paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area in accordance with S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 might the Local Plan set out the required design response.</p>	<p>It is considered that the detail of the design approach for the site can be dealt with at the stage of a planning application when the comments made here can be addressed directly. Historic England will be consulted and their input welcomed to ensure that the historic environment is protected and enhanced.</p>
<p>H46A Gallows Hill (Strawberry Field) 630 dwellings</p>	<p>It is widely accepted that that the southern approach to Warwick, including the Gallows Hill site,</p>	<p>The developers are currently working on plans for the site taking into account the</p>

	<p>contributes to the significance of the town (a designated Conservation Area), the Castle (a Grade 1 Listed Building and Scheduled Monument), and Castle Park, a Grade 1 Registered Park and Garden. The site is also 'in itself' a (non-designated) historic landscape of some historic importance and abuts the Grade II Listed Toll House.</p> <p>National policy expects that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be (NPPF paragraph 132). There is also an expectation that local planning authorities set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, recognising that heritage assets are an irreplaceable resource (NPPF paragraph 126). To ensure the Local Plan's soundness it is important to satisfy these national planning policies.</p> <p>In addition it should be recognised that special regard must be given to desirability of preserving the setting of a listed building; and special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas in the exercise of S66 and S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990).</p> <p>In relation to the recent Asps appeal case, the Council, the local community, Historic England and others presented a clear and robust case and the Inspector and Secretary of State both acknowledged the likely harm to the significance of affected</p>	<p>comments made by Historic England. The plans that are being drawn up are subject to discussion directly with Historic England and therefore will take into account the points raised in this document and agreement will need to be reached before a planning application can progress.</p> <p>A Heritage Assets Assessment document has already been prepared and this can form the basis for future negotiation and inform necessary requirements to ensure the retention of as many aspects of the historic environment as possible can be retained and enhanced.</p>
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	<p>heritage assets. However the Secretary of State placed great importance on the lack of an adequate housing supply and so granted permission. Nevertheless, that decision taken by the Secretary of State does not alter the case that Gallows Hill contributes to the significance of a number of very important heritage assets and that development of that site would cause harm to that significance contrary to national policy.</p> <p>It could be argued that further development to the south of Warwick on the Gallows Hill site will exacerbate the impact of intrusive development within the landscape and that the cumulative impact of development to the south of the town reinforces the importance of Gallows Hill.</p> <p>I note the Council's website statement dated 22 January 2016 following the Asps decision.</p> <p><i>Warwick District Council is very disappointed that the Secretary of State has granted planning permission for 1325 dwellings on these two sites following the public inquiries held last year. The decisions have serious consequences because of the impact on the landscape and the setting of one of our most important and unique heritage assets, Castle Park.</i></p> <p>Historic England has had no reason to disagree with the conclusion of the Councils own evidence - The Setting of Heritage Assets Gallows Hill, Warwick (2014) - <i>that the harm to highly graded heritage assets could not be adequately mitigated or justified and therefore should not take place.</i> It is therefore a surprise to note the Council intends to include Gallows Hill as a development site in the Proposed</p>	
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	<p>Modification to the Local Plan contrary to its own evidence and previous position, most recently during the Asps public inquiry.</p> <p>It should be appreciated that only where harm is unavoidable should mitigation be considered (NPPF Para 152). Any harm and mitigation proposals need to be fully justified and evidenced to ensure they will be successful in reducing harm. It is not apparent whether such a case has been made by the Council to justify the allocation of Gallows Hill, or shown how harm might be mitigated.</p> <p>Modifications to the Local Plan enable the Council to identify suitable sites within the District, and beyond if necessary, to accommodate future growth and the delivery of sustainable development to accord with the NPPF, a core principle being the protection and enhancement of the historic environment. Published Modifications to the Plan show the release of extensive development sites to the south of Coventry (Kings Hill and Westwood Heath). This demonstrates the potential availability of a more suitable alternative to the Gallows Hill allocation. Historic England would encourage the consideration of such an alternative spatial strategy (in respect of the Gallows Hill site), and in doing so demonstrate a positively prepared plan, that is technically sound and in accordance with national planning policy.</p>	
<p>H40 East of Kenilworth (Crewe Lane, Southcrest Farm and Woodside Training Centre) 640 dwellings</p>	<p>Historic England has discussed with the Council how the Local Plan, and future development, can positively respond to the Scheduled Roman archaeology within the site, and the Grade II Thickthorn Manor. We anticipate these matters to be fully resolved and form the basis a Statement of</p>	<p>The assessment has been undertaken and Historic England has been consulted upon the findings which are acceptable and which the Council will take into account when a planning application is received and the site developed.</p>

	Common Ground.	
H48 Barford – Land South of West Ham Lane 45 dwellings	<p>It is not apparent whether evidence been gathered and applied to inform this allocation and demonstrate that special attention has been paid to the desirability of preserving or enhancing the character or appearance of the adjacent Conservation Area in accordance with S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. How should development respond to this context to ensure the Conservation Area's significance is sustained and how should these safeguards be reflected in the Local Plan itself?</p> <p>The Landscape Sensitivity and Ecological & Geological Study – Landscape Addendum January 2016 makes no reference to the Conservation Area, and the site is not included in the Additional Local Plan Site Allocations Historic Environment Assessment Statement (January 2016).</p>	<p>The District Council's Conservation Officer has visited the site and assessed the potential impact upon the Conservation Area and Listed Buildings in the vicinity. In his opinion, the site is located and screened in such a way as to render any impact minimal or non-existent and not of concern</p>

WDC (and WCC) Response to questions raised by Historic England (27th July 2015)

1. Clarification of the outputs of the WCC/stakeholder group in developing a Local Warwick Transport Strategy. Is there a tangible Local Warwick Transport Strategy?

The study, Warwick and Leamington Transport Strategy, undertaken by Atkins Consultants considered the sustainable transport demands, benefits and requirements over a wider area than just Warwick Town Centre. Warwick Town Centre did however feature as a key area within the study. I attach a copy of the report for reference.

2. Clarification of the stakeholder group membership and whether it included any 'heritage' expertise or relevant interest group and whether and how such matters were considered.

Warwick District Council, Leamington Society, Warwick Society and Warwick Castle were included within the stakeholder group membership. Details of group membership are included in the attached document. Heritage was one factor in a range of issues which were considered.

3. Clarification as to whether and how the transport strategy considered and reflected good practice in other historic towns and cities under similar pressure e.g. Oxford, Canterbury?

The study focuses on Demand Management strategies similar to those adopted in the examples cited.

4. How traffic volumes through Warwick can be reduced?

This is a complex question which the Study has attempted to address and which has fed through in to the Local Plan's IDP. The result may not be a reduction in traffic below existing levels but will certainly mitigate much of the potential impacts resulting from the additional Local Plan housing. The Study and the IDP focus on a combination of

- a) improvements to the Strategic Road Network, thereby reducing journey times travelling around the town
- b) providing better alternatives than travelling through town centre routes (such as improving access to the motorway via Europa Way),
- c) adopting the demand management strategies (such as park and ride; encouraging sustainable transport options and workplace parking levies) identified through the Warwick and Leamington Transport Strategy.

This work will help to mitigate the impact of development in Warwick.

5. Will capacity improvements reduce traffic congestion? What are the implications if they do not?

The Strategic Transport Assessments

(http://www.warwickdc.gov.uk/info/20416/evidence_base) demonstrate the level of impact at each junction. Schemes are being refined as a result of the Warwick and Leamington Strategy outcomes. All schemes will consider the needs of all highway users (see the Corridor approach set out in the appendices to the IDP: [Transport Corridor Strategies](#))

The modelling evidence in the STAs clearly demonstrates a need for mitigation of some form within the town centre. As the Strategic Assessments demonstrate that impacts can be mitigated, we can be confident that when detailed assessments are undertaken and optimised, that the schemes will manage traffic congestion. It should be noted that it is not reasonable to expect Local Plan mitigation to reduce existing traffic congestion, rather NPPF states that the impact from development should not be severe.

It should be noted that traffic growth is experienced within Warwick irrespective of the Local Plan development allocation option, this is documented in evidence supplied STA1-STA4, furthermore general non-Local Plan traffic growth would result in impacts being experienced. Therefore some of these schemes are required as a result of Local Plan impacts exacerbating forecast background growth impacts.

Due to known concerns relating to the historic environment, especially within Warwick Town centre, a set of schemes have been identified which minimise the extent and number of schemes required whilst also minimising the delay, congestion and associated environmental impacts (e.g. AQ, impact on sustainable modes). The STA4 schemes have taken this a step further and demonstrates the scope to reduce/remove the schemes in the Warwick town centre area. This includes:

- Castle Hill gyratory - STA4 Ch.6 RTC assessment identifies the possibility of removing this mitigation, the network still operates but there are residual impacts. Warwick and Leamington Transport Strategy goes onto test the removal alongside further sustainable transport options and proves the removal can be achieved if more radical sustainable transport initiatives are adopted.
- Priory Rd/Smith St - there is an existing congestion issue at this location which is exacerbated by Local Plan growth. This scheme provides an opportunity to reduce street clutter, improve the public realm in the surrounding area and provide improved facilities for non-motorised users. This would also tie into one of the key sustainable transport corridors identified through the Atkins study.
- Myton Rd/Banbury Rd -, there is already a severe congestion issue mainly linked to the peak in school travel arrivals/departures and commuter travel. This scheme provides the opportunity to introduce pedestrian and cycle crossing facilities where none currently exist, this especially important at this location given the proximity to 2 major schools and the significant pedestrian/cycle footfall between Warwick Tech Park and Warwick. However, the most recent work shows that the footprint of this scheme will be reduced whilst still providing improved pedestrian and cycling access to the town centre, local schools and businesses

All schemes within the core town centre are located within existing carriageway. The impact on the historic environment will be considered further during the development, feasibility and design of the schemes. It should be noted that the form of the schemes identified within the STA will be subject to change during the design process, at which point more detailed

environmental/historical assessments will be undertaken. This is highlighted in STA3

"Furthermore, it should not be assumed that the schemes recommended through this study are fixed and will be delivered in the form described within this report. Rather it is intended that the schemes proposed are outline schemes which may change through further optimisation and detailed design that will precede the final delivery."

All schemes will be designed in adherence to guidance set out in the Design Manual for Roads and Bridges and the Manual for Streets.

In response to concerns raised by stakeholders relating to the mitigation highlighted within Warwick and Leamington area, County transport planners have been working with WCC Public Health, Warwick District, local employers, residents, Sustrans and other stakeholders in order to explore the sustainable transport options available in more detail. This work, Warwick and Leamington Transport Strategy (WLTS) has identified that a higher modal shift towards sustainable modes can be achieved than adopted in the STAs and this may result in the schemes identified being reduced in scale, removed or amended to accommodate sustainable travel options. Furthermore the study will identify the need to reallocate roadspace to sustainable modes, thus improving the public realm within Warwick and Leamington town centres. Objective 2 of this study states "To protect the historic built environment of Warwick and Leamington Spa", further to this, LTP3 overall objectives (3) states "To reduce the impact of transport on people and the (built and natural) environment and improve the journey experience of transport users".

It should be noted that due to the robust assessments using micro scale modelling, the County Council has been able to identify possible schemes layouts as mitigation packages. Evidence provided for other Local Plans within the County and within other LA's has adopted a more strategic approach to modelling and more specific mitigation packages cannot be identified through this type of modelling process. The robust approach adopted by the County has enabled the identification of key concerns relating to the impact on historic environment, other transport users, AQ etc at a much earlier point in the planning process. This has enabled the County to identify ways to mitigate these impacts through further study work such as the WLTS and the Cycle Network Strategy (see attached draft Cycle Network Plan).

The work undertaken by the County in partnership with WDC has identified that there is a highway solution to traffic growth generated by LP development, but has also identified ways to reduce the impacts of this mitigation through alternative measures. The details of some of these measures are still in development, but others are in detailed design stage as development in this area begins to come on stream. All the measures are described within the IDP. As highlighted previously, during the development of these schemes the DMRB and Manual for Streets will be used to guide the development process alongside further stakeholder engagement.

6. What public transport improvements are proposed; noting that on its own I understand this does little to reduce car driving unless accompanied by some form of constraint?

The STA and Warwick and Leamington Strategy work has identified the following improvements

- P&R and associated service improvements
- Warwick and Leamington Bus Network Review to ensure comprehensive network coverage to new and existing sites.
- Potential for Bus Priority along Europa Way
- In addition contributions to the provision of a bus service have been required. Even before the recent appeal decisions at the Asps and Gallows Hill, these have totalled over £2m

This will build on the recent improvement to bus services (e.g.X19 extension to Gaydon/JLR major employer), access to rail scheme in Warwick and planned improvements for improved access by road, cycle and pedestrian to Warwick Parkway as part of the A46 Stanks roundabout and corridor improvements.

7. Are there to be initiatives to reduce traffic entering the historic town centre?

There are no plans to reduce traffic entering the town through the implementation of restrictions, such as a congestion charge. There is little political or stakeholder support for such an approach and the WLTS showed that schemes of this nature were unlikely to make a significant impact.

However development impacts can be mitigated through offering improved alternative routes (i.e using SRN) and improved offer for sustainable modes as identified through the STA and Warwick and Leamington Strategy.

8. Will there be restrictions on town centre car parking?

The Atkins study recommended "Development of a joint county and district parking strategy review intended to develop a coherent integrated strategy covering parking standards for new development; park and ride policy; work place parking levy policy/feasibility and other parking related issues." It also stated that consideration should be given to increasing long stay parking charges as part of a wider strategy to secure long term benefits of the sustainable transport strategy and Park and Ride.

It should be noted however, that this is a highly controversial issue and the impacts of increased parking charges or reduced town centre capacity on the economic well-being of the town centres are important. The impact of such an approach on the long-term wellbeing of the historic environment is not understood and would need to be factored in if any significant change were to be proposed. One option being considered is to reduce commuter traffic through work place parking charges and the provision of a park and ride. This would enable car journeys to the town centre to focus on visitors and shoppers thereby supporting the local economy and environment at the same time.

9. What other forms of transport/movement might be promoted e.g. walking and cycling, and if so, how?

The Warwick and Leamington Strategy work focuses on these movements. WCC is currently exploring 20mph zones and walking and cycling improvements

within the town centre. Earlier answers have covered public transport and cycling.

10. How might the constraints of the historic street pattern and urban form promote creative/better responses than traditional engineered solutions?

This is an issue that will be addressed through detailed scheme design and has not been directly addressed through the more strategic work carried out in support of the Local Plan. WCC is currently exploring a number of town centre schemes and how they might fit with/enhance the user's experience of the historic environment. This may extend to a more comprehensive study covering the whole town centre.

11. What are the implications for Warwick's Unique Selling Point (USP) – its heritage; its historic townscape, public realm, conservation area and individual heritage assets?

The key to protecting Warwick's USP is to ensure that its heritage is protected, that it remains vital and prosperous and that it is accessible by a range of transport modes. It is accepted that the additional housing proposed through the Local Plan will have an impact on the town centre, but this is likely to be a mixed blessing.

So there are several parts to answering this question:

- Schemes identified through the STA will help to protect Warwick from the impacts of congestion within Warwick whilst also providing improved non-motorised user facilities.
- The Warwick and Leamington Strategy builds on this approach and provides a holistic view on the approach to provision of sustainable transport facilities. As mentioned previously these can be designed in such a way as to improve the user/visitor experience through improved access and public realm whilst also being sensitive to conservation and heritage needs.
- Specifically the approach outlined in the Local Plan's IDP seeks to improve public transport options; limit journeys to and through the Town Centre by locating housing and improving the highway network to offer alternatives to town centre routes; by providing park and ride facilities and by seeking to address specific areas of congestion through targeted junction improvements which also support other transport modes and which link to a wider corridor approach
- As transport schemes are designed a careful balance will be struck to ensure they are functional for a range of users and they respect the local environment. In this way individual heritage assets will be protected. The most significant scheme may be the one at Myton Road/Banbury Road. WDC have undertaken a study which explores the heritage impacts of signals in this location and this will be part of the considerations as a detailed scheme is designed.

12. What are the implications on the 'designed' route into Warwick from the south?

Regarding the improvements to the southern approach to Warwick, the following justification for these improvements is provided

- There is an existing congestion issue which already detracts from the historic environment offer.
- The improvement will help to manage congestion outside Warwick School whilst also improving the provision for cyclists and pedestrians
- The impact of the additional housing without these improvements would be unacceptable.
- The improvements complement the strategy of encouraging traffic to go around the town (using the motorway) rather than through.
- With 4000 planned houses to the south of Warwick it is inevitable transport improvements are required, without such improvements the congestion impact would be significant, which in turn would have a significant impact on the historic environment and the visitor experience.

The key is therefore to ensure the improvements are carried out in a way that respects the designed approach. In particular the improvements already discussed will:

- Try to focus traffic along Europa Way rather than Banbury. Europa will become a dual carriageway
- Ensure the recently approved developments at the Asps and Gallows will continue to provide an open buffer between Banbury Road and the new houses
- Ensure the footprint of the Myton Road/Banbury Road junction will be minimised and signals will be avoided if possible (although studies undertaken to date suggest that signals are important in managing the already significant traffic congestion at this junction); further this junction needs to be viewed in the context of the existing junction at Banbury Road/Gallows Hill which is already signalised and provides an urbanised context for the approach.
- Through careful design elsewhere, remove the need for the proposed improvements at Castle Hill thereby protecting this important setting

13. How are measures in the local plan /transport strategy to be funded and delivered?

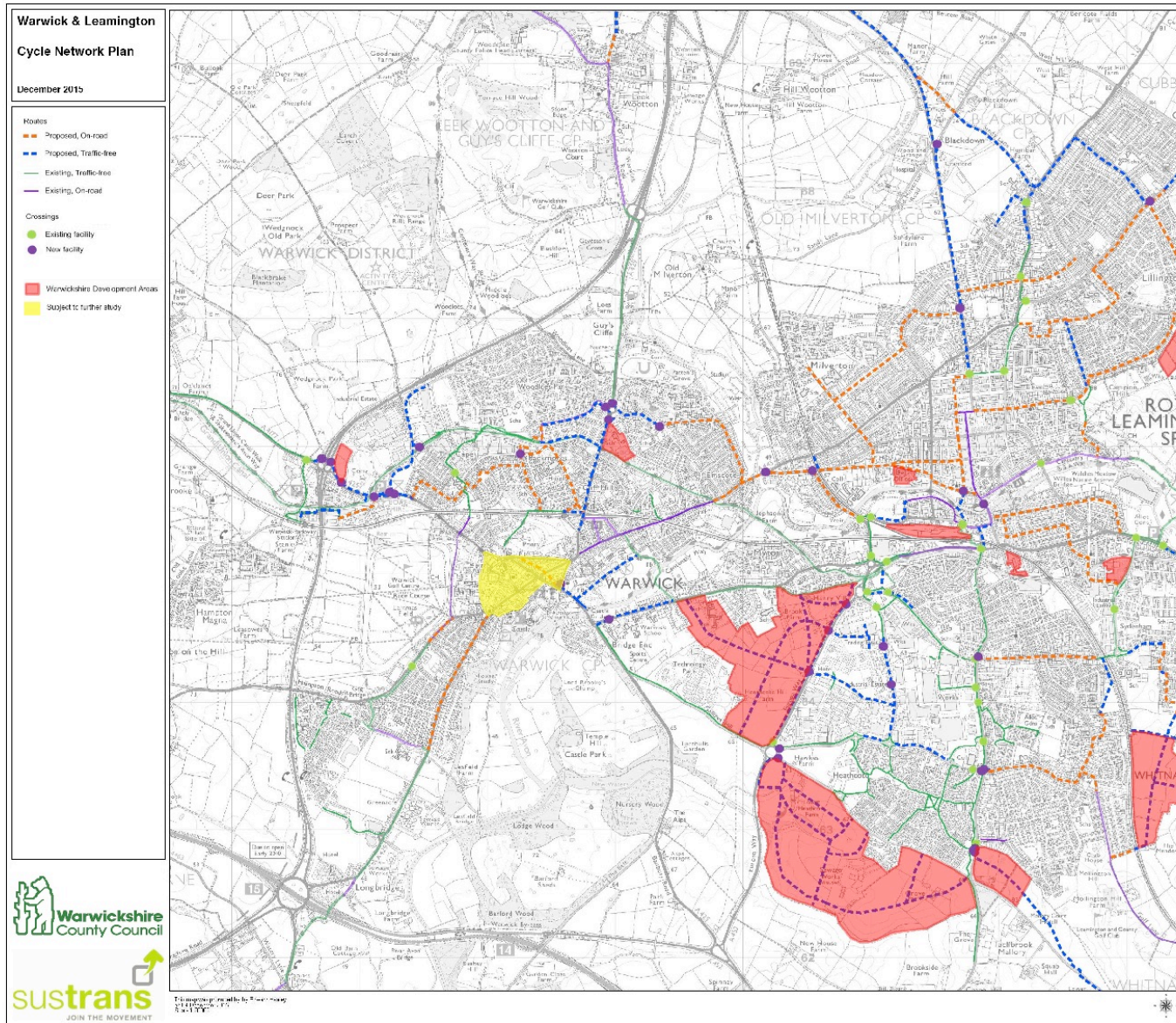
WDC have already secured approximately £13m in association with Local Plan allocated sites via S106. Further contributions will be sought via a number of channels S106, S278 and Community Infrastructure Levy will be used to secure monies from developers. Alongside, WCC is preparing business cases to maximise the potential of securing national funding bids, local funding and Highways England funding. A recent example of this multiple funding source approach is the A46 Stanks/A425 Corridor Improvement which is funded through CWLEP Growth Deal Funding, WCC Growth Fund and S106. The appeal decisions at the Asps and Gallows provide further funding and allow for the dualling of Europa Way and for the provision of park and ride

14. Can the Local Plan and associated transport strategy demonstrate an improvement to historic Warwick? What are the consequences?

As described through the answers above, the Local Plan and associated transport strategy can help to improve historic Warwick through the management of transport impacts, an improved sustainable transport offer creating better access for all and sensitive design approaches and public realm

improvements. All of this will provide visitors and residents an improved environment for the appreciation of historic Warwick.

Cycle Network Map for the area follows.



Further comments following meeting between HE and WDC to discuss outstanding issues:

In response to EH reps:

It should be noted that traffic growth is experienced within Warwick irrespective of the Local Plan development allocation option, this is documented in evidence supplied STA1-STA4, furthermore general non-Local Plan traffic growth would result in impacts being experienced.

Therefore some of these schemes are required as a result of Local Plan impacts exacerbating forecast background growth impacts.

Due to known concerns relating to the historic environment, especially within Warwick Town centre, a set of schemes have been identified which minimise the extent and number of schemes required whilst also minimising the delay, congestion and associated environmental impacts (e.g. AQ, impact on sustainable modes). STA4 schemes have taken this a step further and demonstrates the scope to reduce/remove the schemes in the Warwick town centre area. This includes:

- Castle Hill gyratory - STA4 Ch.6 RTC assessment identifies the possibility of removing this mitigation, the network still operates but there are residual impacts. Warwick and Leamington Transport Strategy goes onto test the removal alongside further sustainable transport options and proves the removal can be achieved if more radical sustainable transport initiatives are adopted.
- Priory Rd/Smith St - this scheme actually presents the possibility of reducing existing street clutter.
- Myton Rd/Banbury Rd - the footprint of this scheme is reduced whilst still providing improved pedestrian and cycling access to the town centre, local schools and businesses

All schemes within the core town centre are located within existing carriageway. The impact on the historic environment will be considered further during the development, feasibility and design of the schemes. It should be noted that the form of the schemes identified within the STA will be subject to change during the design process, at which point more detailed environmental/historical assessments will be undertaken this is highlighted in STA3 (below). All schemes will be designed in adherence to guidance set out in the Design Manual for Roads and Bridges and the Manual for Streets.

"Furthermore, it should not be assumed that the schemes recommended through this study are fixed and will be delivered in the form described within this report. Rather it is intended that the schemes proposed are outline schemes which may change through further optimisation and detailed design that will precede the final delivery."

Source: STA3

In response to concerns raised by stakeholders relating to the mitigation highlighted within Warwick and Leamington area, County transport planners have been working with WCC Public Health, Warwick District, local employers, residents, Sustrans and other stakeholders in order to explore the sustainable transport options available in more detail. This work, Warwick and Leamington Transport Strategy (WLTS- report to be made available as part of the submission to EiP) has identified that a higher modal shift towards sustainable modes can be achieved than adopted in the STAs and this may result in the schemes identified being reduced in scale, removed or amended to accommodate sustainable travel options. Furthermore the study will identify the need to reallocate roadspace to sustainable modes, thus improving the public realm within Warwick and Leamington town centres. Objective 2 of this study states *"To protect the historic built environment of Warwick and Leamington Spa"*, further to this, LTP3 overall objectives (3) states *"To reduce*

the impact of transport on people and the {built and natural} environment and improve the journey experience of transport users".

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The work undertaken by the County in partnership with WDC has identified that there is a highway solution to traffic growth generated by LP development, but has also identified ways to reduce the impacts of this mitigation through alternative measures. The details of these measures are still in development but will be described in as much detail as possible within the IDP. As highlighted previously, during the development of these schemes the DMRB and Manual for Streets will be used to guide the development process alongside further stakeholder engagement.

SINCE THESE COMMENTS WERE ISSUED WCC HAS PROPOSED NEW MEASURES TO ADDRESS WARWICK TOWN CENTRE TRAFFIC ISSUES AND THESE CAN BE FOUND ON THEIR WEBSITE HERE:

<http://www.warwickshire.gov.uk/warwicktowncentre>

From: Stephen Cross stephen.cross@warwickdc.gov.uk
Subject: Re: Statement of Common Ground with Historic England
Date: 24 October 2016 at 17:58
To: Lorna Coldicott Lorna.Coldicott@warwickdc.gov.uk

SC

Dear Lorna,

I am pleased to sign off the SoCG HE comments updated 5/10/16 together with the associated Matters Statement.

Regards
Stephen Cross
Development Portfolio Holder
Town & District Councillor for Warwick - Woodloes
email: stephen.cross@warwickdc.gov.uk

From: Lorna Coldicott <lorna.coldicott@warwickdc.gov.uk>
Sent: Monday, October 24, 2016 1:17 pm
Subject: Statement of Common Ground with Historic England
To: Stephen Cross <stephen.cross@warwickdc.gov.uk>

Good afternoon Cllr. Cross,

Please could you sign off the attached SoCG for submission to the Inspector tomorrow with our Matters Statements?
Just the usual phraseology is fine thank you.

Kind regards
Lorna

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Planning Policy
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