

# ENGLISH HERITAGE

WEST MIDLANDS

The Strategic Planning Team  
Planning and Regeneration  
The Council House  
Burcot Lane  
Bromsgrove  
Worcestershire  
B60 1AA

Our Ref: HDP 5242



11 November 2013

strategicplanning@bromsgroveandredditch.gov.uk

Dear Sirs,

## **Bromsgrove District Plan 2011-2030 Proposed Submission Document**

Thank you for consulting English Heritage on the proposed submission document. As the Government's Statutory Advisor on the Historic Environment, English Heritage has considered the Plan mindful of the expectation that it enables the delivery of sustainable development in accordance with the NPPF<sup>1</sup> one of the core dimensions being the protection and enhancement of the historic environment<sup>2</sup>.

Whilst the Plan demonstrates an evident commitment to the positive planning for the historic environment unfortunately I have two important queries relating to two key strategic allocations, at Ravensbank and Hagley.

### **Policy BDP5B - Ravensbank employment allocation**

The proposed allocation is within approximately 150 metres of Gorcott Hall a circa 1550 Grade II\* listed building, and five other associated Grade II listed structures. No evidence appears to have been gathered and applied to assess the impact on the significance of these heritage assets as required by the NPPF.

B078/1

I am also concerned by the Sustainability Appraisal's (SA) assessment of the impact of this proposal relating to the SA Environmental Objective EV4 - *Conserve, protect and enhance the architectural, cultural and historic environment*. At page 255 the SA states "The site is not within nor adjacent to a conservation area and there are no listed buildings located nearby". Consequently the SA report considers there is no impact on the historic environment. Clearly there is an anomaly here which English Heritage recommends is addressed.

You will appreciate that great weight should be given to the conservation of heritage assets and any harm from development within their setting requires clear and convincing justification<sup>3</sup>.

<sup>1</sup> NPPF, Paragraphs 151 and 182

<sup>2</sup> NPPF, Paragraph 7

<sup>3</sup> NPPF, Paragraph 132

## Policy BDP5B - Hagley Development site

8078/2 This major development is within proximity to Hagley Hall (1758) and its associated Park, both Grade I (the highest national designation). Whilst I appreciate the proposal is approximately 325 metres from the Park one would expect that due to the significance of these heritage assets evidence would be available to demonstrate that consideration has been given to the potential impact. Again the Sustainability Appraisal makes no reference to the relevance and proximity of any heritage asset.

In view of the above I am concerned that you may not be able are you able to demonstrate that

1. The Bromsgrove District Plan is based on adequate, up-to-date and relevant evidence about the historic environment<sup>4</sup>;
2. You have considered whether there is a need to identify land where development would be inappropriate because of its historic significance<sup>5</sup>.

But for these discreet matters of concern I acknowledge and welcome the thorough and positive approach employed within the Plan, especially Policy BDP20, and I am confident this will help to secure real improvements to the District's historic environment over the Plan period.

I await your response to the above.

Yours faithfully,



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<sup>4</sup> NPPF Paragraphs 158 and 169

<sup>5</sup> NPPF, Paragraph 157

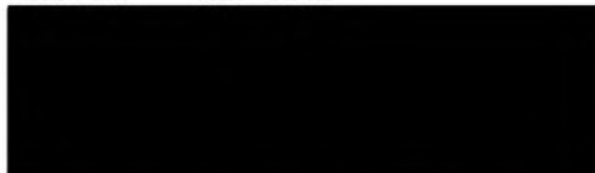


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