

Table 1: Historic England comments on the South Staffordshire Local Plan, December 2021

Paragraph/ Figure/ Site	Historic England
Paragraph 2.3	We support the reference to heritage within the introductory paragraphs.
Question 1	We consider that the evidence base relating to the historic environment is welcomed and needs strengthening in some circumstances. We also require a link between the evidence base and its recommendations and the policy text in the Local Plan itself.
Table 2	<p>We welcome the inclusion of heritage as a strength within the ‘built assets’ section and it is important to remember that natural landscapes are historic landscapes and that heritage is equally necessary to consider within the natural landscape section as it is the built asset section.</p> <p>We consider that there could be opportunities for the historic environment within this section too, such as reducing heritage at risk, increasing heritage tourism and access to heritage for residents and tourists.</p>
Table 5	We welcome the reference to heritage within this section.
Page 23	We would welcome a reference within the vision for the historic environment and how the Plan intends to reflect heritage in the future.
Table 6	We welcome strategic objective 13, however, it is important to recognise that heritage also relates to historic landscapes, of which all landscapes are a part of, and the need for the historic environment, heritage assets and their settings to be protected and enhanced is important. The current objective focusses only on the ‘built’ element of heritage and we would welcome a broader definition.
Policy DS2	Recommend amending ‘historic assets’ to ‘heritage assets’ to reflect National Planning Policy Framework (NPPF).
Paragraph 4.12	If the Council consider it the most appropriate strategy to deliver unmet needs from neighbouring authorities; Historic England urges them to ensure that their historic environment, heritage assets and setting are protected and enhanced fully through the allocation of this additional development.

Housing Growth from Locality 1 paragraph 4.21	We note that there is no reference to heritage within this section, other than a brief reference to the historic village of Kinver. As such it is difficult to assess how the significance of the historic environment, heritage assets and their setting have been considered as a result of the cumulative impact of proposed housing development within these localities. This is further relevant for the other housing localities and is important to consider when bringing forward a number of sites in one area which cumulatively could have an impact on heritage assets, for example Conservation Areas.
Paragraph 4.58	We will await the findings of the updated Economic Development Needs Assessment at the next iteration of the Local Plan.
Policy DS3	We would advise strengthening the wording of the clause relating to heritage to ensure that the significance of the historic environment, heritage assets and their setting are protected and where possible, enhanced.
Policy DS4/ Question 6/ Appendix F	We would welcome reference to the historic environment within this policy and how it will be protected and enhanced if a future site allocation were to come forward. We would require an assessment to fully consider the impacts and opportunities for the historic environment prior to the allocation of a site. In its current form there is little detail about the location of a site and how it may be brought forward. Appendix F identifies a huge swathe of land within South Staffordshire that does have the potential to substantially affect the historic environment and this would need to be appropriately assessed. Historic England are keen to engage at an early opportunity in this process. Is there a benefit in this policy approach in the current situation of Local Plans being updated every 5 years.
Section 5	<p>Specific comments relating to sites and heritage assessment to date:</p> <p>Policy SA1: Land East of Bilbrook – there is currently no reference to the recommendations in the HESA Report 2019, we would welcome the inclusion of these recommendations and the historic environment fully considered within the masterplanning/SPD stage.</p> <p>Policy SA2: Land at Cross Green – we can find no reference within the heritage assessment to this site or what the implications may be for the historic environment. If you are able to send us the information through we will provide commentary.</p> <p>Policy SA3: Land North of Linthouse Lane - we can find no reference within the heritage assessment to this site or what the implications may be for the historic environment. If you are able to send us the information through we will provide commentary.</p>

Policy SA4: Land North of Penkrige – Listed as Site 420 within the HESA Report 2019 there are designated assets within 500m range of the development and the potential for archaeology to be affected as well as the Penkrige Conservation Area. We would recommend additional detail be provided as to how the significance of heritage assets will be affected and appropriate mitigation strategies; these should then be incorporated into the policy.

Site 419 Land at Keepers Lane is referenced within the HESA Report 2019, with reference to mitigation strategies that will be required and these should be referenced within policy text in the Local Plan.

Site 224 Land adjacent to 44 Station Road – we do have some concerns regarding this site given its proximity to the Codsall Conservation Area. We would like additional detail on how the significance of heritage assets will be affected and what mitigation measures can be put into place in the Local Plan to protect them.

Site 141 Walsall Road – HESA Report 2019 relates only to an earlier report in 2017 with no detail available as to what the potential issues were.

Site 136 Landywood Lane – this scores as an Amber within the HESA Report 2019 and we would recommend that appropriate mitigation measures are incorporated into policy text within the Local Plan.

Site 139 Pool View - HESA Report 2019 relates only to an earlier report in 2017 with no detail available as to what the potential issues were.

Site 638 Loades PLC – the HESA Report 2020 states that there are no designated heritage assets within 350m of the site, which is a departure to the usual methodology of 500m that the assessment has reflected. Are there any heritage assets within the 500m boundary? As mentioned previous Historic England is keen to ensure that the impact to the significance of heritage assets and their setting is fully considered and notes that a designated boundary of 500m may not always be sufficient. Any required mitigation measures should be incorporated into text in the Local Plan.

Site 704 Norton Lane – the HESA Report 2020 states that the proposed allocation is located near to the Watling Street Roman Road and there is potential for archaeological remains to be present in this area as well as the need to protect this non designated heritage asset. This site is listed as Amber within the heritage assessment and we

do require some additional information and a mitigation strategy that can be incorporated into policy text in the Local Plan.

Site 536a Holly Lane – how will the significance of the designated Grade II farmhouse be affected? What mitigation measures are possible to protect this asset and how can these measures be appropriately incorporated into policy text?

Site 005 Cherrybrook Drive - how will the significance of the designated Grade II farmhouse be affected? What mitigation measures are possible to protect this asset and how can these measures be appropriately incorporated into policy text?

Site 617 Four Ashes Road – we do have some concerns about how the Brewood Conservation Area may be affected and would request that the mitigation measures assess how this proposed development could better reveal the significance of the Conservation Area and the design be in keeping with the character of the area. Additionally, there is the possibility for archaeological remains close to the line of the Roman Road.

Site 079 Kiddlemore Green Road – we have some concerns regarding this site and the variety and amount of heritage assets that could be affected by this proposed allocation, including the Brewood Conservation Area, Canal Conservation Area and a wide range of listed buildings. How does the development site contribute to the significance of these heritage assets and are there mitigation measures that could be put in policy text in the Local Plan, to overcome these issues?

Site 591 Oaklands Farm - how will the significance of the designated Grade II farmhouse be affected? What mitigation measures are possible to protect this asset and how can these measures be appropriately incorporated into policy text?

Site 016 Pear Tree Farm - how will the significance of the designated Grade II farmhouse be affected? What mitigation measures are possible to protect this asset and how can these measures be appropriately incorporated into policy text?

Site 274 Land South of White Hill – we have concerns regarding this site and require additional detail about how the significance of the hillfort at Kinver Camp can be protected and what mitigation measures are possible, if any.

Site 272 Dunsley Drive – we have concerns about how this development may affect the Kinver Conservation Area and require some additional detail to assess how the site contributes to the significance of the Conservation Area and what mitigation measures are possible to protect this heritage asset.

Site 576 Hyde Lane – we would welcome mitigation measures incorporated into policy text that state how the Grade II Inn and its setting will be protected.

Site 239 West Wrottesley Road – there is reference in the HESA Report 2019 about possible crop marks and field boundaries detailing historic character and a heritage asset where the setting will need to be protected. We recommend that these measures are incorporated into policy text.

Site 416 Land of Orton Lane – the assessment references the need to consider potential archaeological remains and this should be sited in the policy text.

Site 285 et al Pool House Road – there are a number of heritage assets listed within the vicinity of this site and a reference within the policy text to the required mitigation measures would be beneficial.

Site 463/284 Bunns Lane/ Gilbert Lane – we have some concerns over this site and the potential impact for the Womborne Conservation Area and numerous heritage assets. We would welcome additional information and a mitigation strategy that seeks to protect these heritage assets and better reveal the significance of the conservation area.

Site 286 – Sytch Lane – how will the significance of the Himley Hall Registered Park and Garden be affected by this proposed development?

Site 082 – Stafford Lane - how will the significance of the designated Grade II farmhouse be affected? What mitigation measures are possible to protect this asset and how can these measures be appropriately incorporated into policy text?

Site 168 Brinsford Bridge – how will the significance of the designated heritage assets referenced by affected? Namely Grade II* Moseley Old Hall.

Site 397 – Brookhouse Lane - how will the significance of the designated heritage assets referenced by affected? Namely Grade II* Moseley Old Hall.

Site 255 Clive Road – HESA Report 2019 sets out the need to consider the archaeological remains on the site and the impact to nearby heritage assets.

Site 251 Hall End Farm – there are concerns about the impact to the Pattingham Conservation Area and the need for mitigation measures to protect this asset and other local non designated heritage assets.

Site 313 Himley Lane - - how will the significance of the designated Grade II farmhouse be affected? What mitigation measures are possible to protect this asset and how can these measures be appropriately incorporated into policy text?

Site 379 Back Lane – HESA Report 2019 recommends the inclusion of mitigation measures for heritage features on and near to the site.

Site 426a Bridge Farm – additional information is required to understand the impact on the listed heritage assets and if there are suitable mitigation strategies that can be incorporated into policy text.

Site 610 Marston Road - additional information is required to understand the impact on the listed heritage assets and if there are suitable mitigation strategies that can be incorporated into policy text.

Site 036c Stafford Lane – mitigation measures are required to be included within policy text in the Local Plan.

Site 582 Langley Road – how will the Castlecroft Garden Conservation Area be protected?

We note in Appendix C site proformas there is currently no reference to heritage and the required mitigation measures outlined in the evidence base. We would recommend that these are included in the next iteration of the Local Plan.

GT01, 05, 06, 08, 18, 23, 32, 33 – all these sites scored green in the HESA Report 2019 yet there were a number of mitigation measures identified that were required to be included within policy text in the Local Plan.

	<p>GT07/ GT14/ GT17/ GT34/ GT35 (HESA Report 2021) – Is listed as Amber within the HESA Report 2019 and we would require some additional detail to understand what the impacts are for the historic environment/ appropriate mitigation measures.</p> <p>The employment sites listed within Table 9 do not have a site reference number and as such we are unsure if these sites have been assessed within the HESA Report 2019 or a later addition. Can you please provide information regarding the employment sites and how these have been assessed so that we are able to offer appropriate comments.</p> <p>Site E33 SFRI we would require additional information on the impacts for the significance of heritage assets and how this site could be taken forward without causing harm to the historic environment. We note that a DCO has been granted on this site and are keen to ensure that the appropriate evidence base is provided at the required time within the DCO process.</p>
HC9	We are supportive of appropriate reference to the historic environment within this policy; including a range of criteria that look at locally distinctive design and what that means in different areas, height of development, scale and massing suited to historic character and locations, landscape character, reference to conservation area appraisals and management plans, materials and the need to protect the significance of heritage assets, including their setting. We would be supportive of an SPD to enhance the advice in this area.
Paragraph 6.12	We are supportive of the sentiment in this paragraph and consider that it may be beneficial to provide some additional detail on landscape/historic characterisation for prospective developers.
Paragraph 6.13	We would encourage that the Council set out a list of what they expect to see within required Masterplans so they can be sure that the information submitted is fit for purpose.
Policy EC4	We would welcome reference to heritage tourism within this policy.
Policy NB1	We would welcome reference to heritage landscapes and landscape character within this policy. We are unclear what is meant by ‘historic parkland’ within the context of this policy?
Policy NB4	We support the inclusion of a policy relating to landscape character.

Policy NB5	We are supportive of a policy on renewable and low carbon technologies and recognise the importance of this policy in the fight against climate change. We would encourage the Council to consider how climate change and heritage interrelate and where the policy is inappropriate for the historic environment.
Policy NB9	We would recommend that the Council amends the title of the policy to wording similar to 'Protection and enhancement of the historic environment and heritage assets'. We recommend that the Council uses the hierarchical approach set out in the NPPF and relates to the need to protect and enhance the significance of heritage assets. We would not be supportive of a clause relating to enabling development within a local plan policy. We will comment in detail on the specific wording of the policy at the next iteration of the local plan. Consider how the policy relates to archaeology both designated and non designated. Additionally, we would support a clause that looks at the recording of heritage assets and inclusion of information on the Historic Environment Record (HER) at the minimum. We welcome the inclusion of a policy relating to the historic environment.
Policy NB10	We would welcome reference to heritage within the canal network policy and the need to protect this asset as an intrinsic part of the historic environment.