



CLIENT: Clowes Developments Limited  
SITE: Lawnswood Road, Wordsley  
PURPOSE: Review of Historic Environment Site Assessment

## Overview

South Staffordshire District Council is consulting on a regulation 19 version of their local plan, together with its supporting evidence base. Node has been commissioned to undertake a review of the Historic Environment Site Assessment (2022) in relation to a site owned by Clowes Developments Ltd, at Lawnswood Road, Wordsley, Stourbridge.

This follows Node's original appointment in 2019 to undertake a heritage-led masterplan on the site, which was presented as part of a submission to the South Staffordshire Local Plan review call for sites (December 2019) and the production of a heritage statement which articulated the heritage-led approach to the design process, which was presented as part of an updated representation to the South Staffordshire Local Plan in December 2021.

This review has been undertaken by Katie Kershaw (IHBC), an urban design and heritage consultant, who is a director of Node, a registered practice with the Institute for Historic Building Conservation, the Urban Design Group and the Landscape Institute.

## The site

The site is located at Lawnswood Road, Stourbridge within South Staffordshire district. It is formed of two parcels of land located to the north and south of Lawnswood, which collectively measure 55.89ha (138.1 acres). The site is not subject to any statutory heritage designations. It does, however, include an area of land within its northern parcel which is identified on Staffordshire's Historic Environment Record as a pleasure grounds and is within the immediate setting of heritage assets, including a stable range and entrance lodge to the east and Holland House to the south (all listed at grade II); together with the non-designated Lawnswood House and associated buildings, to the east of the site (see appendix 1).

## The Historic Environment Site Assessment

South Staffordshire District Council commissioned AOC Archaeology Group (AOC) to undertake an Historic Environment Site Assessment. The purpose of the Historic Environment Site Assessment is to ensure that the impact on the historic environment, including impacts upon the setting of heritage assets, was properly considered in the site selection process in preparation of the Local Plan. The Historic Environment Site Assessment has been completed in a number of phases, the first of which was undertaken in 2017 in support of the South Staffordshire Local Plan Site Allocations Document.

The current, second assessment has been undertaken in two stages:

- Stage 1: The initial phase considered 425 sites that were being promoted for housing, employment and gypsy/ traveller/ showpeople (GTS) use. These assessments were undertaken in four separate blocks in December 2019, June 2020, July 2021 and August 2022 as further sites were proposed for allocation. This phase is described as: “a high-level desk-based assessment” within the report.
- Stage 2: The most recent version (October 2022), comprises a more detailed assessment, informed by first hand walkover surveys and site visits, of the 68 sites that were proposed for allocation.

Both the Stage 1 and Stage 2 assessments considered the potential for both direct (physical) and indirect (setting and character) effects on both designated and non-designated assets. These effects were scored separately using a red, amber, green (RAG) system which was assessed using the following criteria:

- *Green: No concerns identified, on current evidence, although archaeological mitigation measures may be required.*
- *Amber: No significant effects which cannot be mitigated predicted.*
- *Red: Significant effects predicted. Mitigation unlikely to be possible.*

Overall scores for each site were determined by the highest predicted RAG score (worst case scenario): if a site scored green for direct effects and amber for indirect (setting and character) effects, then the predicted score for the site was amber.

## Historic Environment Site Assessment findings for site 654 Lawnswood

The site at Lawnswood Road was considered within the Stage 1 process of the Historic Environment Site Assessment as ‘Site 654 Lawnswood’. The following assessments were made in 2019 and 2020 respectively:

- **2019:** Site 654 Lawnswood Site B: *A Red indirect impact upon setting is predicted due to the presence of a non-designated landscaped park which extends across the central part of the site and due to the site’s proximity to Listed Buildings associated with the park. Although no designated assets are located on the Site itself the boundary surrounds two Grade II Listed Buildings a stable range (List No. 1459911) and an entrance lodge (List No. 1459906) associated with Lawnswood House, a non-designated villa of 1839. The Staffordshire HER records a contemporary landscaped park and pleasure grounds, extending north and west from the House across the central part of the Site and modern aerial mapping suggests that this park survives. A third unrelated Grade II Listed Building, Holland House (List No. 1277296) stands to the immediate south of the Site. Care will need to be taken to ensure that the settings of the Listed Buildings as well as the setting and character of the non-designated landscaped park are respected and retained by any development. This may mean that it is not possible to develop within the non-designated landscaped park. Although no non-designated archaeological sites are recorded on the Site, the Staffordshire HER records a range of non-designated assets within 500 m including the projected line of the Greensforge to Droitwich Roman Road which passes immediately south of the Site. Mitigation will be required to address any archaeological remains which could potentially be present on the Site.*
- **2020:** Site 654 Lawnswood Site B: *This considered a proposed boundary revision to a site for which a Red score had previously been predicted in 2019. The Red score was due to the presence of a non-designated landscaped park extending across the central part of the site and due to the site’s proximity to Listed Buildings associated with the park. The proposed boundary revision would not have changed this and consequently the Red score continued to apply.*

Following the 'worst case scenario' methodology above, the site as a whole was recorded as red on the basis of its assessment of red indirect effects, however it should be noted that the direct effects associated with the site were only recorded as amber, signifying no significant effects which cannot be mitigated.

## Response to Historic Environment Site Assessment Stage 1

In response to the findings of stage 1 of the Historic Environment Site Assessment, Node prepared a heritage statement, which was submitted as part of a wider representation on behalf of the site in 2021. The study reviewed in detail the site and its historic context, including defining the significance of the heritage assets which are referenced within the Historic Environment Site Assessment:

- Grade II listed stable range at Lawnswood House.
- Grade II listed entrance lodge with curved walling and gate piers at Lawnswood House.
- Grade II listed Holland House.
- Lawnswood House and non-designated assets associated with Lawnswood House, including Potting Sheds, Boiler House, Office and Glasshouse.
- Contemporary landscaped park and pleasure grounds extending north and west from Lawnswood House.
- Lawnswood Farm (recorded as Lawneswood Farm on the HER), located between the site's two land parcels.
- Wider non-designated heritage assets as identified on the Staffordshire Historic Environment Record.

(See appendix 2)

This provided analysis of the site and context, heritage statements of significance for the identified heritage assets and a heritage impact assessment for the proposed development. The study demonstrated that the design development process that led to the production of the 2019 masterplan was informed by heritage analysis and a sensitive approach to design, shaped by heritage-led design principles.

It also directly addressed the concerns raised in the 'Historic Environment Site Assessment' by articulating how the design could respond to the site's historic context in the following ways:

- No development is proposed within the extent of the area identified on the HER as a non-designated landscaped park. Instead, the area is embraced within the development as the focal public spaces, and public access is enabled to allow greater appreciation of its landscape amenity, and the heritage interest of the grounds and associated heritage assets of the Lawnswood House estate.
- Strategic green corridors are proposed either side of the non-designated landscaped park to create a buffer, which will protect the immediate setting of the parkland, together with Lawnswood House and associated buildings, including the two grade II listed buildings within the Lawnswood House estate.
- The strategic landscape design provides a southern landscape space which will ensure that development cannot physically or visually encroach upon the grade II listed Holland House, located to the south of the site.
- The design of the proposed clusters of built development are to be guided by the principle of responding to the historic setting of Lawnswood House, its associated buildings and landscaped park. This would require a sensitive approach to the interface with the landscape buffer, such as a lower density to development, which would be further softened and filtered by landscape planting.

This study sought to provide a detailed and clear evidence base to South Staffordshire District Council with much greater clarity on the heritage sensitivity of the site and how a considered design response could mitigate its impacts, which would allow a more balanced and informed consideration of the site for allocation.

## 2022 updated position

Within the 2022 updated Historic Environment Site Assessment' report, it appears that no further assessment of the site has taken place. A summary position in relation to the Lawnswood Road site has been provided as follows, which simply reiterates the findings of the earlier assessment:

Site 654 Lawnswood Site B (Predicted Indirect Effect on Setting): *Although no designated assets are located on the site itself the boundary surrounds two Grade II Listed Buildings: a stable range (List No. 1459911) and an entrance lodge (List No. 1459906) associated with Lawnswood House, itself a non-designated villa of 1839. The Staffordshire HER records a contemporary landscaped park and pleasure grounds extending north and west from Lawnswood House across the central part of the site and modern aerial mapping suggests that this park survives. A third unrelated Grade II Listed Building, Holland House (List No. 1277296) stands to the immediate south of the site. Care will need to be taken to ensure that the settings of the Listed Buildings as well as the setting and character of the non-designated landscaped park are respected and retained by any development. This may mean that it is not possible to develop within the non-designated landscaped park. Although no non-designated archaeological sites are recorded on the site, the Staffordshire HER records a range of non-designated assets within 500 m, including the projected line of the Greensforge to Droitwich Roman Road which passes immediately south of the site. Mitigation will be required to address any impacts upon archaeological remains which could potentially be present on the site.*

## Our response

The stage 1 process was acknowledged within the HESA to be 'a high-level desk-based assessment.'

Regarding its scope, it states: *'The purpose of the Stage 1 assessment was to identify sites where development could have a significant impact on the historic environment from an early stage in the site selection process and it was used by the Council to inform the selection of preferred sites for allocation. As such it was a high-level assessment and drew upon a range of sources, most notably the local authority Historic Environment Record (HER), Historic England designation downloads and the National Heritage List, although a range of other sources including historic Ordnance Survey mapping and LiDAR data were also consulted.'*

In the face of the detailed heritage statement evidence base provided to South Staffordshire District Council within the December 2021 representation, it is disappointing that the site does not appear to have been subject to any further assessment from a historic environment perspective within stage 2, with only the council's preferred option sites taken forward for the latest stage of assessment.

We contend that the high-level nature of the stage 1 assessment lacks the nuance and understanding of a primary survey and ignored the potential for a design led response within its findings. Our report, with significantly more detailed analysis of the significance of heritage assets and an explanation of the heritage led evolution of the design, provided an evidence base borne out of comprehensive primary survey, historic research and integrated, heritage-led design development.

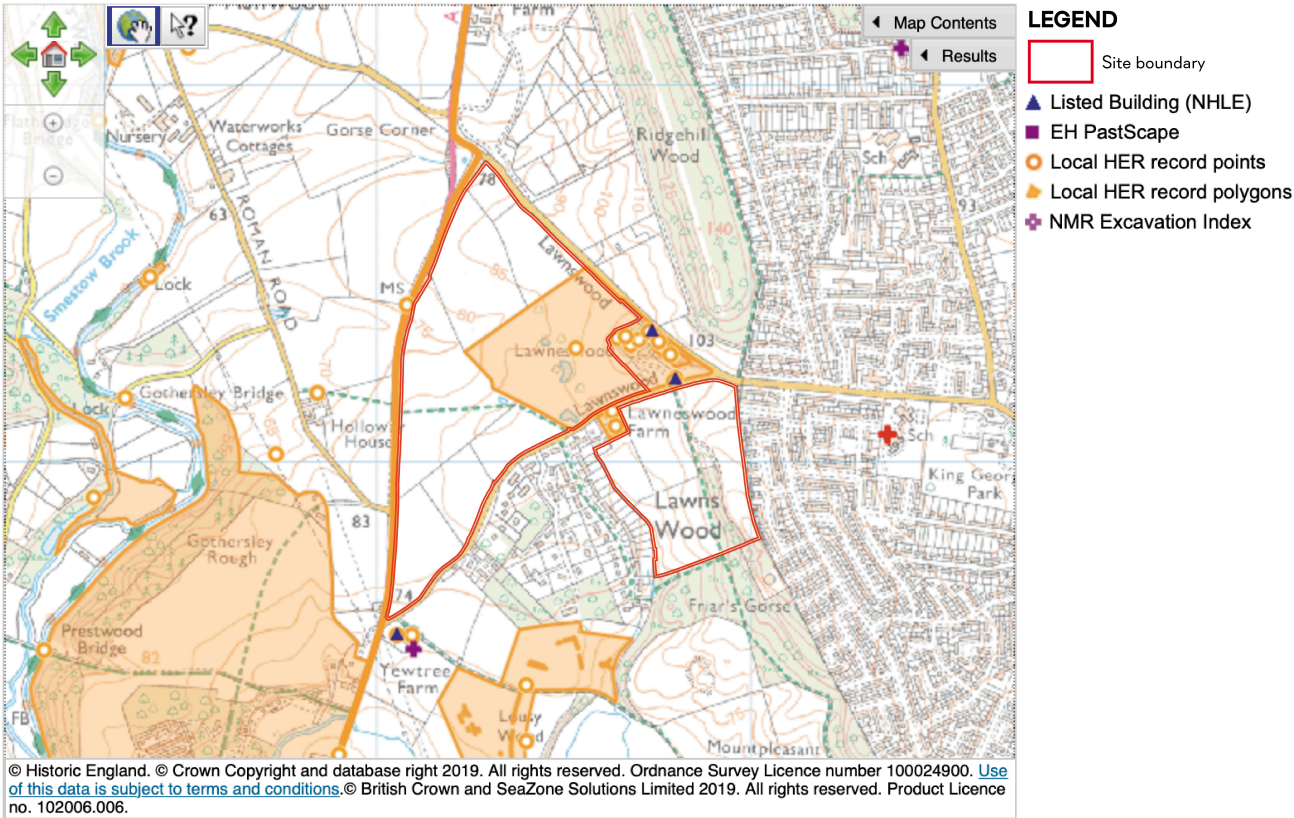
## Conclusion

This review of the South Staffordshire Historic Environment Site Assessment in relation to a site a Lawnswood Road, Wordsley has been undertaken by Katie Kershaw (IHBC), director of Node, a registered practice with the Institute for Historic Building Conservation, the Urban Design Group and the Landscape Institute.

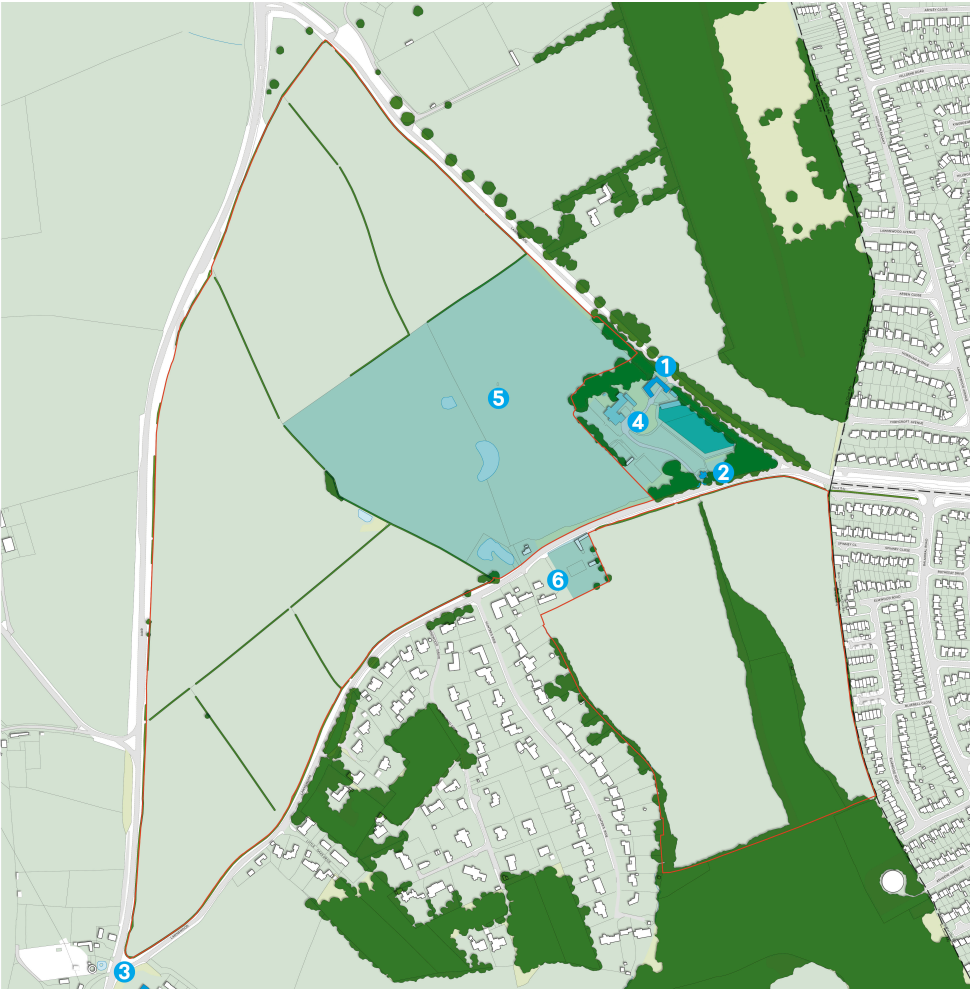
We wish to reiterate our documented position within our submitted heritage statement (2021) which counters the assertions made in the Historic Environment Site Assessment, which states: *'Site 654 Lawnswood Site B: A Red indirect impact upon setting is predicted due to the presence of a non-designated landscaped park which extends across the central part of the site and due to the site's proximity to Listed Buildings associated with the park.'*

We wish to refer South Staffordshire District Council again to the evidence provided within the heritage statement (2021) which clearly articulates how a heritage-led design can deliver a sensitive future vision for the site. We argue within this study that through a sympathetic approach to design as advocated by the heritage-led design principles and illustrated by the resultant masterplan, these issues can be successfully mitigated to a large degree. Where residual adverse impacts may remain, the development offers significant opportunities to provide public benefits to outweigh that harm, as required by the NPPF. Moreover, the heritage-led design approach will deliver these benefits, notably enabling a new public amenity to be created from the historically private pleasure grounds, markedly enhancing the ability to experience its landscape and heritage value, as well as that of associated heritage assets including Lawnswood House.




### Appendix 1: Historic Environment Record



### Appendix 2: Heritage assets



**LEGEND**

-  Site boundary
-  Grade II listed building
-  Non-designated heritage asset

1. Stable range at Lawnswood House
2. Entrance lodge with curved walling and gate piers at Lawnswood House
3. Holland House
4. Lawnswood House and associated non designated heritage assets, including potting sheds, boiler house, office and glasshouse
5. Landscaped park and pleasure grounds extending north and west from Lawnswood House
6. Lawnswood Farm

0 200 metres