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29 May 2024

FAO: [localplans@sstaffs.gov.uk](mailto:localplans@sstaffs.gov.uk)

Dear Sir/Madam,

**Re: South Staffordshire Council Local Plan Review 2021-2041, Publication Plan (Regulation 19) Consultation, April 2024**

Thank you for consulting Historic England (HE) on the South Staffordshire Local Plan Review Publication Plan - Regulation 19 consultation. We note that this document follows a previous Regulation 19 consultation document, which HE commented on in December 2022.

In relation to this Local Plan Review Publication document we have the following comments:

Firstly, HE welcomes that the Publication Plan has, in many cases, been amended in line with our comments on the previous consultation document (attached as **Appendix A**) and that it is accompanied by heritage evidence, namely the “*Historic Environment Site Assessment (HESA) 2022*” and the “*HESA Update 2023*”. These documents assess the impact of development on the significance of designated and non-designated heritage assets and their settings and recommend appropriate mitigation and enhancement measures.

Whilst we are pleased to see that many of the mitigation measures recommended by the HESA 2022 document have now been carried through into the Plan, in some cases there still appears to be some confusion between what constitutes mitigation and what constitutes enhancement, particularly with regard to the retention and planting of trees and hedgerows. Therefore, we suggest that where relevant the plan makes clear that the **retention** of trees and hedgerows constitutes **mitigation**, whilst the **additional planting** of trees and hedgerows constitutes **enhancement**.



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We also note the provision of site specific recommendations in both HESA documents, but consider that it would be helpful to provide a link to the relevant HESA document within the specific policy. This would ensure that the appropriate mitigation and enhancement measures are provided and that the Plan demonstrates a sound approach to the historic environment. We refer you to our comments on the previous Publication Plan consultation in relation to specific sites (please see **Appendix A**) and highlight that this point is pertinent to the “*Key Requirements*” for the following sites: **419 a and b, 139, 536a, 638, 006, 617, 562/415, 459, 082, 251, 313, GT01, GT06, GT07 and GT14.**

In terms of proposed allocations, we note that one employment site has been added (**E30**) and that several housing sites have been removed from the Plan; namely Strategic Sites **SA2 and SA3**, and sites **079, 576, 463/824, 426a, 582, GT05, GT33, GT34 and GT35.**

In relation to our specific comments on the relevant policies and proposed allocated sites we have set these out below, with reference to our previous comments (please see **Appendix A**):

### **Policy MA1 – Masterplanning Strategic Sites**

HE continues to recommend that reference is made within the policy to the need to conserve the significance of heritage assets, including their setting, as a specific bullet point.

### **Policy NB8: Protection and enhancement of the historic environment and heritage assets**

HE reiterates that the text should be amended to read that ‘*development proposals should demonstrate how they conserve and enhance the significance of heritage assets, including their setting*’ in line with NPPF requirements, and that details relating to ‘*character, appearance and function*’ could then follow on from this.

In the penultimate paragraph of the policy we suggest that the ‘*sustainable reuse of heritage assets*’ be amended to ‘*appropriate reuse*’ and that the wording now inserted in brackets, ‘*where appropriate*’, be deleted, as this inaccurately alters the meaning of the wording.

### **Policy HC10: Design Requirements**

We reiterate our previous request that a link be made to evidence base documents relating to historic townscape and landscape character, as this would assist prospective applicants in understanding local character.





## Policy EC4: Rural Economy

We welcome that the policy has been amended to include a clause relating more specifically to the historic environment. However, we note that this clause still includes amenity, rather than being solely heritage focussed as previously suggested.

## Policy NB4: Landscape Character

HE notes that from November 2023 AONBs have been renamed as '*National Landscapes*' and consider that the policy should be amended to reference this new terminology where appropriate.

## Policy NB6c: Embodied carbon and waste

In addition to our previous comments on this policy, HE would also stress that heritage assets can be a valuable aid to achieving sustainable development, in both climate change mitigation and adaptation. For example, retaining, repairing, refurbishing, retrofitting and reusing heritage assets, especially historic buildings, can contribute to reducing carbon emissions. We therefore suggest that the policy also references the importance of the historic environment in respect of the embodied carbon value of historic buildings, and in particular, the contribution that the retention and reuse of old buildings makes, together with the sustainability of traditional building materials and design.

## Appendix C Proposed Housing Allocations

We note that although some amendments have been made in line with our previous comments, we would specifically refer you to the following proposed allocations where our comments have not been fully addressed: **119a, 523, 136, 536a, 313, 036c**.

## Proposed Employment Allocations

Site **E44** - HE considers that our previous comments regarding this site have not been addressed, and strongly recommends that this policy is amended in line with our previous suggestions (please see attached **Appendix A**).

Newly added site **E30** – as there are three grade II listed buildings adjacent to this proposed employment site and the potential for non-designated heritage assets to be impacted by development, we recommend that heritage is included within the '*Key Requirements*' of the policy, reflecting the recommendations of the HESA Update 2023 that: care will need to be taken whilst designing any development to ensure that the settings of the Grade II assets, and Dunston Farmhouse in particular, are protected; any planning application should be accompanied by a Heritage Impact Assessment which should consider the potential for both direct and setting impacts; and mitigation measures should include a trial trench evaluation and a geophysical survey in order to address the potential for direct impacts upon any archaeological remains that may be present.





With regard to the Sustainability Appraisal (SA) Report: Regulation 19, April 2024, we have no additional comments to add to those made in relation to the SA that accompanied the previous Regulation 19 consultation (please see our attached **Appendix A**).

Therefore, whilst we have some detailed comments on specific policies and proposed allocations, it is our view that with the inclusion of the amendments detailed above, overall the current Regulation 19 Plan demonstrates a positive approach to the historic environment as required by NPPF para.196 and with the requested amendments, we would consider the Plan to be sound in respect of historic environment issues.

We should like to stress that the above opinion is based on the information provided by the Council in their Regulation 19 consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise (either as a result of this consultation, or in later versions of the plan/guidance) where we consider that these would have an adverse impact upon the historic environment.

We hope that the above comments will assist, but if you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.

Yours faithfully,

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