

**Historic England response to the Draft Solihull Local Plan Supplementary Consultation
15 March 2019**



As the Government’s adviser, Historic England aims to support the delivery of sustainable development and the National Planning Policy Framework’s (NPPF) objective of protecting and enhancing the historic environment (NPPF para 8). We have welcomed SMBC’s invitations to inform the emerging Plan, and taken the opportunity to meet with Officers to offer our advice. We hope our engagement, and this additional response, will help ensure a robust, effective and sound Local Plan that positively responds to the area’s rich and varied historic environment.

SMBC LP reference	Historic England comment
<p>Section 4. Site Selection</p> <p>Q2. Do you agree with the methodology of the site selection process, if not why not and what alternative/amendment would you suggest?</p>	<p>Historic England note that the local authority consider that sites are acceptable where development would either have <i>no or only a relatively low impact</i> on the historic environment <i>or that a more severe impact can be mitigated against. This may include reducing the size of the site to avoid the most harmful impacts</i> (para 72 and footnote 33).</p> <p>Historic England note that the relative suitability of a site will be judged against whether <i>harm to the historic environment can be mitigated</i> (para 75).</p> <p>Q. It would be helpful for the local authority to confirm that the above accords with the need to :</p> <ul style="list-style-type: none"> • take sufficient account of the evidence base to avoid or minimise harm to the significance of heritage assets (NPPF para 190) • attach great weight to the conservation of effected heritage assets (NPPF para.193), and • have had due regard to the desirability of preserving the setting of effected listed buildings in accordance with S66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990.
<p>Q3. Do you agree with</p>	<p>Para 88 suggests a preferred route for a Balsall Common By-pass. Is the Council able to indicate the route on a</p>

<p><i>the infrastructure requirements identified for Balsall Common, if not why not; or do you believe there are any other matters that should be included?</i></p>	<p>map and share any information it has gathered to show the relative impact on landscape character and or the setting of any affected heritage asset; and whether other potential routes may have been considered. Is this new road an element of the Plan you are seeking a response to?</p>
<p>Site 1: Barretts Farm, Balsall Common</p> <p><i>Q4. Do you believe that Site 1 Barratt's Farm should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?</i></p>	<p>Historic England understands that a Heritage Impact Assessment of this proposed allocation has been commissioned by the local authority. This vital evidence will help the Council and interested parties in a consideration of the site's suitability in principle and, without prejudice, an appropriate design response to satisfy national policy and legislation in relation to the historic environment and the delivery of sustainable development.</p> <p>Notwithstanding that the above evidence has not been available to be applied, Historic England acknowledge the merit of the SMBC Draft Concept Masterplanning exercise and how the local authority considers potential future development might respond to the affected heritage assets.</p> <p>We also note that the local authority considers there are shortcomings with the Developers Proposal and we, as a result, attach limited weight to this as a potential acceptable suggestion.</p>
<p>Site 2 Frog Lane, Balsall Common</p> <p><i>Q5. Do you believe that Site 2 Frog Lane should be included as allocated site, if not why not? Do you have any comments on the draft concept</i></p>	<p>Historic England understands that a Heritage Impact Assessment of this proposed allocation has been commissioned by the local authority. This vital evidence will help the Council and interested parties in a consideration of the site's suitability in principle and, without prejudice, an appropriate design response to satisfy national policy and legislation in relation to the historic environment and the delivery of sustainable development.</p> <p>Notwithstanding that the above evidence has not been applied, Historic England acknowledge the merit of the SMBC Draft Concept Masterplanning exercise and how the local authority considers potential future development might respond to the affected heritage assets.</p>

<i>masterplan for the site?</i>	
<p>Site 3: Windmill Lane, Balsall Common</p> <p><i>Q6. Do you believe that Site 3 Windmill Lane should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?</i></p>	<p>The Site Analysis in the Draft Concept Masterplan (page 22) refers to the Berkswell Windmill as a Grade II Listed Building. The structure is actually Grade II*, a more nationally significant historic building than Grade II and which, as a result, demands that considerable weight is applied to its conservation (NPPF para 193). The analysis also appears to suggest the Windmill has a rather narrow setting, perhaps underestimating its significance in the wider landscape. This may therefore effect how the principle and extent of development has been considered, and without prejudice, how potential future development might respond to safeguard its attributes.</p> <p>It will be helpful for the local authority to clarify what is meant by the “zone of significant influence” and how “high architectural value” may be relevant in relation to safeguarding the significance of the Windmill as a heritage asset.</p> <p>Due to the status of the Windmill it will be important that the findings of the local authority’s Heritage Impact Assessment, including its analysis of setting, inform the Council and interested parties consideration of the principle of the site’s suitability and, without prejudice, an appropriate design response to satisfy national policy and legislation in relation to the historic environment and the delivery of sustainable development.</p> <p>To ensure a Sound Plan it will be important for the local authority to demonstrate that it has</p> <ul style="list-style-type: none"> • taken sufficient account of the evidence base to avoid or minimise harm to the significance of the Windmill (NPPF para 190) • attached great weight to the conservation of the Windmill (NPPF para.193), and • that it has had due regard to the desirability of preserving the setting of the Windmill , a Grade II* Listed Building, in accordance with S66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990.

	<p>It appears the local authority's commentary in relation the Catesby Estates Ltd Site Proposal implies it has concerns with how it responds to the significance of the Windmill. Historic England therefore attaches limited weight to it as a potential appropriate response.</p> <p>With regard to the generic Site Assessments (January 2019) we note that this site (site reference 138) scores poorly in relation to the Sustainability Appraisal and that the landscape is considered to have a low capacity to accommodate change.</p> <p>Without publication of the local authority's Heritage Impact Assessment of this site, Historic England is unable to consider whether the principle and proposed response set out in the SMBC Draft Concept Masterplan is appropriate. We would therefore welcome the opportunity to discuss this matter with the Council once the Heritage Impact Assessment becomes available. It will also be helpful to establish whether the local authority considers this additional evidence requires a reconsideration of the principle and /or the Draft Concept Masterplan.</p>
<p>Site 23: Lavender Hall Farm, Balsall Common</p> <p><i>Q9. Do you believe that Site 23 Lavender Hall Farm should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?</i></p>	<p>Although we acknowledge the SMBC Draft illustrative Concept Masterplan indicates how potential future development could respond to the affected heritage assets, it will be important to consider the local authority's completed Heritage Impact Assessment of this site, to inform the principle and without prejudice the appropriate response.</p>
<p>Site 8: Hampton Road,</p>	<p>Grimshaw Hall is Grade I Listed and one of the most impressive timber framed buildings of the Midlands. This</p>

<p>Knowle (Grimshaw Hall)</p>	<p>status will require the local authority to apply due weight to its conservation. We would also emphasise that any consideration of a proposed allocation will need to demonstrate that sufficient account is taken of the Plan’s evidence base to avoid or minimise harm to the significance of the Hall (NPPF para 190), and that the exercise has had due regard to the desirability of preserving its setting in accordance with S66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990.</p> <p>Historic England notes the site analysis and SMBC Draft Concept Masterplan that states “<i>Development is set back from the road to safeguard the setting of Grimshaw Hall. Development alongside the POS must be of high quality design as there will be filtered views from the listed building to the site. Likewise the trees and hedgerows along Hampton Road must be retained to ensure the character of this approach into Knowle is retained as far as possible</i>”.</p> <p>Without publication of the local authority’s completed Heritage Impact Assessment of this site, Historic England, and other potential interested parties, are unable to consider whether the principle of development or such a proposed response would be appropriate or effective in avoiding harm and the delivery of sustainable development.</p> <p>We would welcome the opportunity to discuss this proposed allocation further following publication of the local authority’s Heritage Impact Assessment. It will also be helpful to consider whether the local authority considers this additional evidence requires a reconsideration of the principle and /or it’s Draft Concept Masterplan.</p>
<p>Site 9: South of Knowle</p>	<p>Historic England acknowledges the SMBC Draft illustrative Concept Masterplan which suggests how potential future development might respond to the affected heritage assets. It will be important that assumptions are underpinned by adequate evidence.</p>
<p>Shirley Site 11: Former TRW Site 12: Land South of Dog Kennel Lane</p>	<p>Historic England understands that a Heritage Impact Assessment of this proposed allocation has been commissioned by the local authority. This vital evidence will help the Council and interested parties in a consideration of the site’s suitability in principle and, without prejudice, an appropriate design response to satisfy</p>

<p>Site 26: Whitlock's End Farm</p> <p><i>Q14. Do you believe that Site 12 south of Dog Kennel Lane should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?</i></p>	<p>national policy and legislation in relation to the historic environment and the delivery of sustainable development.</p> <p>Notwithstanding that the above evidence has not been applied, Historic England acknowledge the merit of the SMBC Draft Concept Masterplanning exercise and how the local authority considers potential future development might respond to the affected heritage assets.</p> <p>To ensure a Sound Plan it will be important for the local authority to demonstrate that it has</p> <ul style="list-style-type: none"> • taken sufficient account of the evidence base to avoid or minimise harm to the significance of the affected heritage assets (NPPF para 190) • attached great weight to the conservation of those assets (NPPF para.193), and • that it has had due regard to the desirability of preserving the setting of those listed buildings, in accordance with S66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990.
<p>Site 16: East of Solihull</p> <p><i>Q26. Do you believe that Site 16 east of Solihull should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?</i></p>	<p>Historic England acknowledges the SMBC Draft illustrative Concept Masterplan which suggests how potential future development might respond to the affected heritage assets. It will be important that assumptions are underpinned by adequate evidence and this is made available to help interested parties consider whether the proposed response is appropriate.</p> <p>To ensure a Sound Plan it will be important for the local authority to demonstrate that it has</p> <ul style="list-style-type: none"> • taken sufficient account of the evidence base to avoid or minimise harm to the significance of the affected heritage assets (NPPF para 190) • attached great weight to the conservation of those assets (NPPF para.193), and • that it has had due regard to the desirability of preserving the setting of those listed buildings, in

	<p>accordance with S66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990.</p>
<p>Section 13 UK Central Hub</p>	<p>Historic England notes at paragraph 326 that <i>"The Council has developed a vision and set of place making principles with key stakeholders to transform The Hub into a distinct place with a strong sense of identity; combining growth aspirations, integrated landscapes..."</i> (Paragraph 326). And,</p> <p><i>"It is proposed that a network of green infrastructure will be integrated throughout the development with the intention to provide a high quality sense of place designed around the idea of the Garden community. The provision of GI is a particularly important element as it will allow existing features to not only be retained, but enhanced as part of an integrated approach".</i> (Paragraph 345)</p> <p>There appears to no reference to the historic environment.</p> <p>The scale and location of development would affect (to varying degrees) the setting of a number of important heritage assets. For example, Park Farmhouse, a Grade II* listed C18 property. There are also numerous designated heritage assets within proximity including the Packington Hall Estate (Grade II*) and various other associated individual assets. It is important for the Plan to consider and positively address the direct and indirect impact on these assets and their setting.</p> <p>Historic England understands that a Heritage Impact Assessment of this area and the proposed allocation has been commissioned by the local authority. This vital evidence will help the Council and interested parties consider an appropriate design response to accord with national policy and legislation in relation to the historic environment and the delivery of sustainable development.</p>

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