

Heritage Assets Harm Versus Public Benefits Statement

Hewell Grange Conservation Area and Grade II* Registered Park and Garden, and Lanehouse Farm

In relation to Area 4 and 5

Introduction

1 During the preparation of the Housing Growth Development Study English Heritage (now Historic England) expressed concern regarding any development of Area 5. No such concern was received in relation to Area 4. No heritage objection had previously been received at the earlier stages of consultation to this site. In order to address these concerns a Heritage Assessment following EH Guidelines was therefore then carried out which concurred with EH's views that development of Area 5 would not be acceptable but this did not apply to Area 4.

2 The Inspector requested at the Hearing sessions in June 2015 that further evidence be produced to demonstrate that the two areas (4 and 5) had been assessed in a comparable manner in relation to heritage.

3 Due to changes in interpretation, clarification via case law and further guidance on heritage issues being produced in the intervening period between the production of the setting assessment and the hearing sessions the conclusion of 'substantial harm' was amended at the hearing sessions to 'less than substantial harm' predominantly on the basis that no demolition to a heritage asset was proposed.

4 The original Setting Assessment has now been updated to include further assessment of Hewell Grange in relation to Area 4 in particular detailed sections on the walled garden and the water tower and an amendment to the conclusion in relation to harm.

5 In the context of Area 4, for completeness, a further Setting Assessment has also been carried out by BDC in relation to Lanehouse Farmhouse, such work being referenced in the HGDS. This Farmhouse is located just outside the boundary of Area 4.

6 The Inspector also requested at the June 2015 hearing sessions that further information be provided explaining the balancing process in relation to harm versus public benefits which this Statement now seeks to address.

7 As detailed in 'the narrative' most of the Focussed Areas (apart from Areas 6 and 11) contain listed buildings and therefore on the majority of the potential sites similar heritage issues to those which have been considered in detail here would need to be addressed.

Policy Context

8 In relation to the historic environment the NPPG states that:

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (Paragraph 7). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a

private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

Hewell Grange Setting Assessment

9 The Setting Assessment concludes that ‘less than substantial harm’ to the setting of Hewell Grange heritage assets would be caused by development at both Areas 4 and Area 5, although in relation to Area 4 however that harm to the setting of heritage assets, particularly the walled garden and water tower, can be mitigated by, for example, repositioning development within the Area. The NPPG states that great weight should be afforded to the preservation of heritage assets. The conclusion of ‘less than substantial harm’ does not mean that the preservation of the setting is diminished, as established in the Barnwell decision.

Balancing Exercise

10 In isolation of the material facts in relation to the setting of the above heritage assets there is no doubt that wider public benefits would accrue from developing land to meet Redditch’s unmet housing need. As such this is not specific to Area 4 or Area 5. Such benefits include:

- The contribution to enable Redditch to achieve a 5 year Housing Land Supply (5YHLS)
- The potential to develop 2800 houses at Area 4 or 1200 houses at Area 5
- 30-40% of the 2800 (840 – 1120 dws) or 1200 homes (360-480 dws) could be affordable
- Economic benefits would ensue from development in the creation of construction jobs
- Economic benefits to the Town Centre and wider Borough as a whole
- Achievement of 5YHLS as a prerequisite for sound Plan. The many benefits of having an adopted Plan include:
 - 1) Provision of a clear planning framework to deliver the vision and development for the future of the area.
 - 2) Provide certainty for developers and utility providers. People investing in the area value the strategic clarity that a Local Plan provides.
 - 3) The clarity of the planning framework set out in an adopted Plan can help authorities to make the case, directly and indirectly, for infrastructure funding.
 - 4) An adopted plan would enable Councils to progress with a Community Infrastructure Levy (CIL) thereby enabling needed infrastructure to be provided.

11 Conversely it could be argued that the preservation of the Green Belt, natural environment and heritage assets are of considerable public benefit for current and future generations.

12 As stated above the public benefits are applicable to any area adjacent to Redditch and as the impacts of any development would be felt more significantly in Area 5, and it is not the only site potentially available this would weigh against public benefits of development in this location as opposed to other areas, such as Area 4. In fact the public benefits at Area 4 could be greater as it is a larger site thereby, for example, generating more construction jobs and generally more economic wealth. Moreover the above Setting Assessment has concluded the development of this Area would have a lesser harmful impact on the setting of this heritage asset than Area 5 due to suitable

mitigation measures being possible for example, boundary changes and the irremovable and substantial barrier already caused by the A448 Bromsgrove Highway. Indeed it could be said that the public benefit of the sensitive development of Area 4 could be to sustain and enhance the significance of the Hewell Grange heritage assets and contribute to its setting by, for example, the protection of important views and complementary landscaping on Area 4 and the protection of Area 5 as a whole.

13 Therefore on balance the harm to the assets associated with development at Area 5 is considered to outweigh the public benefits, as that harm cannot be successfully mitigated. The harm associated with the more limited number of assets (walled garden and water tower) in relation to Area 4 is considered to be outweighed by the considerable public benefits highlighted above by virtue of that harm being minimised by successful mitigation measures.

Lanehouse Farm Setting Assessment

Summary of conclusions from Lanehouse Setting assessment

14 Lanehouse Farm is a Grade II listed building and is therefore governed by S 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which provides statutory weight to the protection of this grade II listed building and its setting.

15 The Lanehouse Setting Assessment concludes 'less than substantial harm' is caused to the heritage asset principally as no demolition is involved. However the harm caused can be minimised via the masterplanning process by, for example, the positioning of development away from the asset, sensitive landscaping and retention of trees.

Balancing exercise

The public benefits are as detailed above

16 Such benefits include:

- The contribution to enable Redditch to achieve a 5 year Housing Land Supply (5YHLS)
- The potential to develop 2800 houses at Area 4
- 30-40% of the 2800 (840 - 1120 dws) could be affordable
- Economic benefits would ensue from development in the creation of construction jobs
- Economic benefits to the Town Centre and wider Borough as a whole
- Achievement of 5YHLS as a prerequisite for sound Plan. The many benefits of having an adopted Plan include:
 - 5) Provision of a clear planning framework to deliver the vision and development for the future of the area.
 - 6) Provide certainty for developers and utility providers. People investing in the area value the strategic clarity that a Local Plan provides.
 - 7) The clarity of the planning framework set out in an adopted Plan can help authorities to make the case, directly and indirectly, for infrastructure funding.
 - 8) An adopted Plan would enable Councils to progress with a Community Infrastructure Levy (CIL) thereby enabling needed infrastructure to be provided

17 Conversely it could be argued that the preservation of the Green Belt natural environment and heritage assets are of considerable public benefit for current and future generations.

18 As stated above the public benefits are applicable to any area adjacent to Redditch it has already been established that the development of Area 4 is less harmful to the Hewell Grange heritage assets than development at Area 5. With specific relation to Area 4 and Lanehouse Farm, as a scheme can be achieved which minimises the harm to the heritage asset this could be said to add additional weight to the public benefit of development as the harm aspect is lessened. Therefore on balance the harm to the assets associated with development at Area 4 is considered to be outweighed by the considerable public benefits identified above by virtue of that harm being minimised by successful mitigation measures.

19 The main orientation of its principal elevation faces towards the south east where housing comprising the urban edge of Redditch at Webheath is already visible.

20 Although the building was once in use as a farmhouse it appears now to be purely a residence with tennis courts and a golf course with few links to its agricultural past in evidence.

21 The group of buildings, including Lanehouse Farm and swallow barns as described in the SA, in which Lanehouse Farm sits can be best appreciated from Cur Lane, from where it is in the direct line of sight for a short stretch immediately to the south east. Cur Lane is lined by compacted and ancient hedgerow which even in winter months provide a dense visual barrier to a significant amount of proposed development.

22 Development is proposed to be located to the north east of the house and to the south some distance from the farmhouse (km). No development would be proposed on the land to the rear of the farmhouse (south west) which itself rises in any case to the north west. The harm arising from the proposals would be limited to the loss of some of the agricultural context predominantly to the north east. Nonetheless, the loss of the open fields to the north east would result in Lanehouse Farm becoming more divorced from some agricultural connections as these fields appear to be used to graze cows and some arable use which would result in some harm to its setting.

23 Therefore on balance the harm to the assets associated with development at Area 4 is considered to be outweighed by the public benefits, as that harm can be successfully mitigated.