THE SUSTAINABLE GROWTH OF CATHEDRAL CITIES AND HISTORIC TOWNS





for English Heritage

by

Green Balance with **David Burton-Pye**

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Author	Job Title	Organisation	Contact details
Richard Bate	Partner	Green Balance	towns@greenbalance.co.uk tel.: 01732 811456
David Burton-Pye		(Sole trader)	info@heritageconsultancy.com tel.: 01902 743950

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Front cover illustrations:

Methodologies for reconciling growth with heritage

Oxford: View cones	Cambridge: Urban intensification
Lichfield: Historic Characterisation	Cambridge: Cambourne new settlement
Chester: Design response to historic environment	

Green Balance
Providence Cottage
Upper Green Road
Shipbourne
Kent TN11 9PL
Tel./fax.: 01732 811456
Email: towns@greenbalance.co.uk
Web: www.greenbalance.co.uk

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SUMMARY

This report investigates the effectiveness of local plan-making in protecting England's heritage at the scale of the character and setting of smaller cathedral cities and historic towns. It explores how current policy and practice address potential tensions between meeting local development needs and giving proper weight to conserving the special qualities of historic settlements.

The first of three principal topics reviewed is the scale of development anticipated in historic towns. A web-based study of fifty historic towns covered by up-to-date development plans was supplemented by interviews with development management staff in their local planning authorities. The data identified show that only modest development is expected in most smaller settlements (under 35,000 population). Otherwise there is no relationship between the size of historic towns and the scale of proposed housing, retail, commercial or infrastructure development. This applies both to development anticipated in the short term (measured by unimplemented permissions) and in the next 5-7 years (measured by commitments in adopted Core Strategies). The majority of planned housing and commercial development, which is particularly space-consuming, is expected on greenfield sites, broadly equating with urban expansion rather than land recycling. No reliable differences are apparent between historic towns in different regions. The heritage interest in towns does not appear to be a determining feature in shaping the type, quantity or location of new development.

The second aspect of the research is a review of the weight given to whole historic towns in the plan-making process and to these policies in practice. Twenty historic towns are examined, each covered by Core Strategies adopted since the publication of the National Planning Policy Framework in March 2012. All relevant heritage policy documents were studied, all Development Plan Documents and their Sustainability Appraisals, and the saved policies from earlier development plans. Telephone interviews were then conducted with the local authority Conservation Officer for each town and with an experienced representative of the leading voluntary sector body in each town concerned with heritage and planning issues.

The findings show that policies in most towns are supported by an adequate or good heritage evidence base and that policies in most former Local Plans provide some basis for heritage planning at the whole town scale. However, new Core Strategies contain insufficiently detailed heritage policies to ensure satisfactory outcomes in relation to other policy pressures, though many do mention the protection of the settings and characters of historic towns. Local policies, such as Area Action Plans, can provide more detailed heritage policies where development is planned in a heritage setting, though experience in taking up the opportunities is variable. Sustainability Appraisals also vary greatly in quality, often failing to provide sufficient conclusions or recommendations to capitalise on the evaluation work. Few Core Strategies had more than limited impact on local heritage strategy: continuity from past practice was prevalent. Likewise, the impact of the National Planning Policy Framework had been modest, with noticeable rebalancing between growth and heritage only in one case.

The key finding across the twenty towns is that the cultural approach of councillors to heritage is critical. The economic wellbeing of towns is councillors' primary concern everywhere, though this is interpreted differently from place to place. Councillors could take views ranging from heritage being beneficial to a town's distinctiveness and economy to it representing a burden and a drag on investment. Attitudes affect the numbers of conservation staff employed, evidence commissioned, policies adopted and decisions taken, all reflecting the relative priority given to heritage. In practice, heritage considerations are having some impact on the scale of development promoted through plan-making at historic towns, but this is secondary to the determination of both central and local government to provide the necessary homes, jobs and facilities needed by a rising number of households. There is some relationship between good heritage policies and good heritage outcomes, but the weight given to heritage policies varies: some policies may be aspirational, whereas in other authorities voluntary organisations successfully spurred councils to take existing heritage policies more seriously. Good heritage policies are necessary, but neither an end in themselves nor sufficient to secure positive results for historic towns.

The principal topic studied in most detail was the third: a report on the methodologies used for reconciling growth with the interests of historic settlements, concentrating on good practice examples illustrating the methodologies available. Whether these are heritage evaluation tools or established planning tools, to be useful they must be adapted to apply at the urban scale within the land use planning system. They are not exclusive, and in many towns and cities more than one is in use. Nine methodologies were chosen and reviewed in their practical application in eight cities. Each methodology is reviewed briefly, explaining its principles, how it functions, selected documents which review it, and examples of places where it has been applied. Greater detail is reserved for the case studies, each presented as appendices to the report, covering the following methodologies in the chosen cities:

– World Heritage Site in Bath;
– both urban intensification and new settlements in Cambridge;
– design response to the historic environment in Chester;
– Green Belt in Durham;
– historic landscape characterisation in Lichfield;
– view cones in Oxford;
– protection of setting in Salisbury; and
– urban extension in Winchester.

None of the case studies demonstrated a perfect solution and all had blurred aspects in practice. Lessons learnt are identified, the main message being that each settlement aiming to capitalise on the findings should chose the methodologies appropriate to its context.

The report comments on heritage-related issues identified across all case study cities: the share of local growth taken by each city; the evidence base available and used for planning purposes in each case; and the number of Conservation Officers employed in each city. Additionally, cross-cutting issues were identified in some cities but not others, each of which were locally significant and would merit further attention: the need for co-operation in cross-boundary planning issues; the unintended consequences of local government reorganisation; the impacts of providing student accommodation; the need to adhere to establish policies when local authorities develop their own land; and the limits to development in historic towns and cities. The report ends with 18 recommendations.

CHAPTER 1

THE PROJECT

Aims and objectives

1.1 English Heritage commissioned this project in spring 2014 to have a better evidence base on the effectiveness of local plan-making in protecting the character and setting of smaller cathedral cities and historic towns. There were two main aims:

1) to understand the extent to which current policy and practice is meeting local development needs while giving proper weight to the core planning principle of conserving heritage assets in a manner appropriate to their significance; and

2) to understand not only how development is impacting on historic places, but also to identify and disseminate information on how local planning authorities should reconcile meeting their assessed development needs with protecting the character and setting of their historic places.

1.2 The objectives of the project were:

i) To provide a national overview of the threats which urban extensions and peripheral growth pose for the heritage significance of the smaller cathedral cities and historic towns. To identify types of development proposals prevalent at the current time and likely trends over the next five to seven years.

ii) To examine how much weight is being given to the need to safeguard the character and setting of smaller cathedral cities and prominent historic towns in the plan-making process.

iii) To consider how the special character of smaller cathedral cities and historic towns in their settings can best be conserved while provision is made to accommodate the future development needs of these settlements. This might involve consideration of local plan processes, methodologies, design approaches, use of existing or modified forms of protection, and other approaches/ideas.

iv) To look at measures local authorities can take to ensure that they give proper weight to the protection of the significance of their cathedral cities and historic towns. To consider the effectiveness of Green Belt designation and see if there are other established designations that can be used to identify the value of undeveloped land around settlements.

Background

1.3 The cathedral cities and historic towns of England are among the country's most treasured and attractive places: they form an important part of the identity of England, and figure prominently in images of 'Englishness'.

1.4 These places are often also thriving contemporary centres of population, economic activity, education, religion and administration, with well-established infrastructure. They provide a wide range of services, not just to their own populations but also to their predominantly rural surroundings. Many cathedral cities and historic towns are seen as desirable places in which to live or work precisely because of their present special character. Their status makes them obvious locations for growth, notably through the identification in emerging local plans of new housing and employment land in urban extensions, recycling of urban land and peripheral development.

1.5 Against this backdrop, these forms of development may have a major impact on the appreciation of the special character or significance of some smaller cathedral cities and principal historic towns. Concern is often focused on the impacts which proposals would have on the historic relationship between a city or town and its landscape setting. This concern is especially acute where the town is focussed on one prominent building, such as a cathedral, major church or castle, which was designed to dominate its surroundings.

1.6 Such concerns arise from an appreciation of the value and attractiveness of these places as they are at present. Many are also important as tourist destinations, with their historic character therefore being of direct value in terms of employment and economy. It could be very damaging to the long-term economic interests of these places if their special character is harmed by poorly-considered new development.

1.7 The research need is therefore in essence to examine how local authorities are considering the growth needs of cathedral cities and historic towns against the need to protect these settlements and their settings. The evidence gathered is needed to help inform the debate about proportionate responses to planned development.

1.8 The analysis tries to measure the present and assess the future, not dwell too much on the past. Past changes to the character of historic towns usually cannot be undone easily, though the experiences can be instructive for the future. Where recent experience is relied upon, the project tries to assess whether that is a guide to the future. The National Planning Policy Framework (NPPF) sets out an 'environmental role' for the planning system which requires it to "contribute to protecting and enhancing the built and historic environment", so this project contributes to a progress review on the NPPF so far as heritage at the whole settlement scale is concerned.

1.9 Our starting point is that growth and change are inevitable in our historic places and this inherently need not be viewed with undue alarm: it is often the opposite risk – of economic decline, with its decay, loss of use and risk of demolition of heritage property, and deterioration in the atmosphere of a place – which poses the more immediate threat to some historic towns. The atmosphere of historic towns also changes with the age, even if the townscape alters little. Two of the principal causes of this are people and vehicles. For example, the advent of mass tourism over the last few decades has transformed the experience of places like Canterbury and Stratford-upon-Avon, while the money brought in has nurtured the maintenance, recycling to new uses and continual improvement in the physical fabric of the heritage of these and many other historic towns. Equally, the growth in traffic over the decades has progressively strangled some historic towns, while others

have been improved radically by the pedestrianisation of large areas and elimination of cars from their centres.

1.10 The difficulty remains to reconcile growth with heritage: the requirements of rising numbers of households against the reasonably fixed stock of heritage. This is also a matter of seeing the wood as well as the trees. There are established expectations of changes that may or may not be made to listed buildings, but there are few expectations of how whole historic towns and cities should change. Individual historic places and their local authorities are working this out for themselves afresh in each case. The results can be highly successful or upsetting. This study does not offer a blueprint, but it does provide some background evidence on what is happening in selected historic towns and cities, and it does review ideas that others may feel worth trying too.

Report structure

1.11 The starting point for the study, in the Brief, was that all towns assessed should be:
– in the population range 10,000-160,000, to cover towns and smaller cities; and
– outside built-up metropolitan areas, so that urban growth patterns under investigation are not significantly affected by neighbouring settlements.

1.12 Chapter 2 addresses objective (i). Within the resources of the project, a national overview of development pressures comprised a review of experiences with growth prospects in a sample of 50 historic towns and cities. The scale of unimplemented planning permissions on greenfield and brownfield sites provided an indication of the current level of growth anticipated for development for housing, retailing, commercial development and infrastructure. Developments in the same categories were identified from approved plans to indicate intended growth patterns over the next five to seven years. Information was gathered from local authority development plans, their websites and by telephone interviews with development management staff. The results are largely quantitative and presented in charts.

1.13 Chapter 3 responds to objective (ii). This provides a detailed review of how whole town heritage (character, townscape and setting) has fared through the forward planning process in twenty historic towns and cities across eighteen local planning authorities. All places were covered by post-NPPF adopted Core Strategies. This enabled some comparison of previous forward plans (old-style Local Plans and Unitary Development Plans) and their effectiveness with the new types of Plan (post-2004) and their prospects. The review includes the evidence base, the policies, the weight given to policies in practice, the Sustainability Appraisals, the political significance of towns' heritage relative to other issues, and the changes in policy and practice which can be attributed to the Core Strategy preparation process and to the NPPF. Information was gathered from local authority documents, their websites and by telephone interviews with both Conservation Officers and representatives of local voluntary heritage organisations.

1.14 The central feature of the project is a commentary on the methodologies which local authorities can use to try to reconcile urban growth with settlement-scale heritage. Chapter 4 outlines the available methodologies identified. It introduces detailed cases studies in

Appendices 3 to 10 which report on good practice in the use of nine methodologies across eight cities. These case studies derive from site visits, analysis of relevant documents and in-depth face-to-face interviews with local authority staff (Conservation Officers and Development Plan Managers) and representatives of local voluntary heritage organisations.

1.15 Chapter 5 summarises each of the eight case studies. It also reviews key background information obtained from all case study cities to identify points of compatibility and difference. These cover the share of local growth taken by the case study city; the evidence base in support of practice in each case; and the numbers of Conservation Officers available. The chapter finishes with a commentary on heritage-related issues which were found to arise in some (though not all) cities. This focuses on cross-boundary planning issues; the effects of local government reorganisation; pressures for student accommodation; and development on local authorities' own land. It finally raises some questions around the development limits to historic towns and cities.

1.16 The report concludes with 18 recommendations.

CHAPTER 2

DEVELOPMENT ANTICIPATED IN 50 HISTORIC TOWNS

2.1 The first objective of the project was "To provide a national overview of the threats which urban extensions and peripheral growth pose for the heritage significance of the smaller cathedral cities and historic towns. To identify types of development proposals prevalent at the current time and likely trends over the next five to seven years."

Research method

2.2 The aspiration to investigate development pressures in as many historic towns and smaller cathedral cities as possible was constrained by practicalities to fifty settlements. This number was intended to be sufficiently large to identify trends but without consuming a disproportionate amount of the project budget. A comparative study between historic settlements and 'non-historic' ones was precluded by resource limitations and by the difficulty of controlling for the many possible reasons for variations in development activity.

2.3 The selection of settlements for study was governed by the following criteria (in addition to the basic ones for the project that all towns should be in the population range 10,000-160,000 and outside built-up metropolitan areas):

(i) in order to be reasonably sure about likely development over the next few years, settlements should only be chosen if located within local planning authorities which have adopted Core Strategies under the Planning Act 2004 (i.e. they are not dependent on out of date growth intentions in plans from the previous forward planning system);
(ii) there should be a reasonable spread of settlements around England, enabling some elementary regional comparisons.

The project steering group made the final selection of settlements for study. Particularly in some regions the choice reflected the limited number of adopted plans as at March 2014. The towns studied are listed in Table 1, together with basic information about them.

2.4 A distinction was drawn between development pressure and actual development. Many settlements in economically buoyant areas are subject to development pressure, but it is not necessarily the case that planning authorities will always wish to accommodate that pressure exactly where it arises. Actual development anticipated is more relevant to this research than is pressure for development. On this basis, future change as set out in development plans was chosen as a superior basis for review than planning applications.

2.5 The objective is expressed in terms of peripheral growth around historic towns, but the wider intention of the project is to review also the impact of development within historic towns. The opportunity was therefore taken to investigate not only total quantities of development anticipated but also development planned for greenfield and for brownfield sites (broadly equating to peripheral growth and urban intensification respectively).

2.6 The project set out to obtain information for each town on:

– housing, retail, commercial and infrastructure development; split between
– land allocated for development on greenfield sites and brownfield sites; and

Table 1 Historic towns and cities studied for the scale of their development pressures

Town/city	Local authority	Region	Population
Ely	East Cambridgeshire	East of England	19,090
Wymondham	South Norfolk*	East of England	13,587
Woodbridge	Suffolk Coastal	East of England	11,341
King's Lynn	King's Lynn & West Norfolk	East of England	46,043
Bury St Edmunds	St Edmundsbury	East of England	41,113
Bedford	Bedford*	East of England	87,590
Braintree	Braintree	East of England	41,634
Witham	Braintree	East of England	25,353
Colchester	Colchester	East of England	119,441
Newmarket	Forest Heath	East of England	20,384
Huntingdon	Huntingdonshire	East of England	23,937
St Ives	Huntingdonshire	East of England	16,384
North Walsham	North Norfolk	East of England	12,463
Beccles	Waveney	East of England	13,868
Newark-on-Trent	Newark & Sherwood	East Midlands	37,084
Stamford	South Kesteven	East Midlands	19,701
Grantham	South Kesteven	East Midlands	41,998
Market Harborough	Harborough*	East Midlands	22,911
Oakham	Rutland	East Midlands	10,922
Retford	Bassetlaw*	East Midlands	22,023
Whitehaven	Copeland*	North West	23,986
Lancaster	Lancaster	North West	48,085
Kendal	South Lakeland	North West	28,586
Ulverston	South Lakeland	North West	11,356
Penrith	Eden	North West	15,181
Henley-on-Thames	South Oxfordshire*	South East	11,494
Hastings	Hastings	South East	91,053
Newbury	West Berkshire	South East	38,762
Winchester	Winchester	South East	45,184
Oxford	Oxford	South East	159,994
Deal	Dover	South East	30,555
Fareham	Fareham	South East	42,210
Dorking	Mole Valley	South East	17,098
Ringwood	New Forest	South East	13,943
Tunbridge Wells	Tunbridge Wells	South East	56,500
Exeter	Exeter	South West	113,507
Taunton	Taunton Deane	South West	60,479
Tiverton	Mid-Devon	South West	19,544
Bridgwater	Sedgemoor	South West	41,276
Tavistock	West Devon	South West	12,280
Harrogate	Harrogate	Yorkshire & The Humber	73,576
Ripon	Harrogate	Yorkshire & The Humber	16,363
Thorne	Doncaster	Yorkshire & The Humber	11,840
Northallerton	Hambleton	Yorkshire & The Humber	16,832
Dudley	Dudley*	West Midlands	79,379
Shrewsbury	Shropshire	West Midlands	71,715
Bridgnorth	Shropshire	West Midlands	12,315
Ludlow	Shropshire	West Midlands	10,511
Stourport-on-Severn	Wyre Forest	West Midlands	20,112
Leek	Staffordshire Moorlands	West Midlands	19,624

* Non-responding authorities; also South Lakeland and Exeter were unable to supply extra data.

– unimplemented planning permissions of each development type (also split between greenfield and brownfield in the case of housing development).

2.7 The information on unimplemented permissions was chosen as the best indicator available on 'development proposals prevalent at the current time' for the purposes of the objective. This is likely to be available in principle from local authority annual monitoring reports or other records held by planning authorities. For an assessment of 'likely trends over the next five to seven years', attention was paid to Core Strategies, allocations plans, area action plans and proposals used by local planning authorities. The future trajectory for the supply of housing is much more closely defined in planning policy than the supply of other development types. The project therefore aimed to identify annual proposed housing land supplies 2015-2020, so far as the planning policies and data recording of local authorities allowed. This would provide a consistent method for comparison between towns. Not all aspects of the data could be fully resolved within the scope of this project. In particular, 'windfall sites' (sites which are not allocated in any development plan but which unexpectedly become available for development and are permitted, usually for housing) can make an important contribution to overall dwelling supplies in some authorities. The inclusion or exclusion of an allowance for windfall sites is not always clear. The result is that generally speaking the contribution of brownfield sites is likely to have been somewhat understated in the results obtained.

2.8 The project aimed to identify development prospects specifically for each town rather than for each authority as a whole. Some development plans facilitated this whereas others did not. Core Strategies without allocations to the local level were less satisfactory than allocations plans and area action plans in this respect. Advice was taken from planning staff where necessary.

2.9 The project was also able to standardise the rate of housing development across all 50 towns by allowing for the different populations of each town. Information is not readily available on the dwelling stock in each town, but population data are more accessible[1]. Other development types could in theory be standardised in the same way, though this could give a false impression of relevance particularly for retailing. For example, occasional major retail development may be making good a deficit, rebalancing between towns, or accompanying growth, rather than indicate anything useful related to historic town size.

2.10 The information required was taken initially so far as practicable from documents available on local authority websites. Where this was unavailable in the detail required, approaches were made to the development management staff. In the event, all local authorities had to be contacted by telephone. Complete or partial responses were obtained for 40 towns with only 9 authorities (10 towns) unable to provide any data (though with an unfortunate concentration affecting three of the five towns in the north-west region). However, the spreadsheet generated for all the data still contains many blank entries due to plans being silent on the issues and information being unavailable from authorities. The presentation of results has therefore erred on the side of caution, and not assumed that

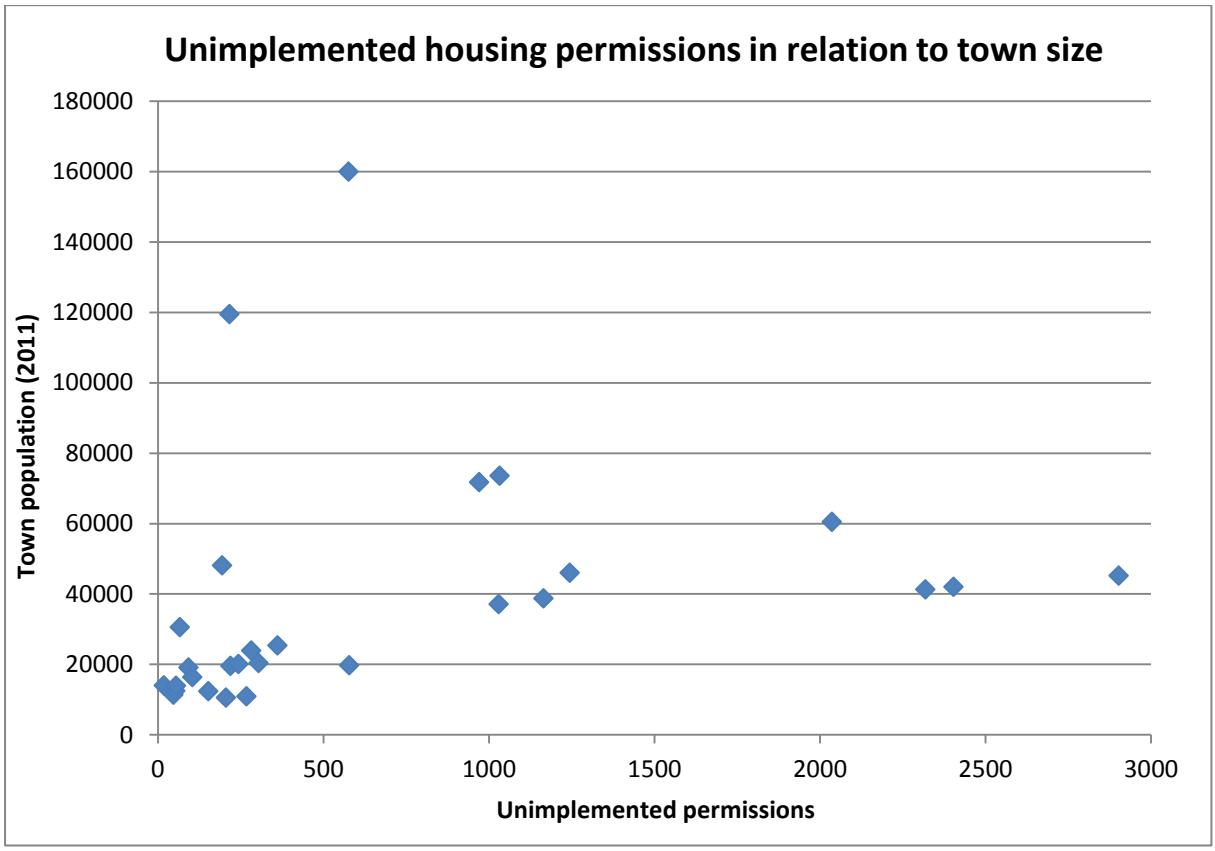
[1] Data were taken for the purposes of this part of the research from www.lovemytown.co.uk, which provides figures from the 2011 Census.

these are zero entries. This particularly affected the findings on unimplemented planning permissions. Footnotes provide more information where needed. All figures refer to units of development rather than to numbers of permissions granted.

Housing development

2.11 The current prospects for housing development can be measured by unimplemented planning permissions. Although some permissions are obtained for valuation purposes, most indicate a desire to see development proceed, subject to other circumstances being favourable. Information on total unimplemented housing permissions is reliably available for 28 of the 50 towns. In Figure 1 these are presented by size of town.

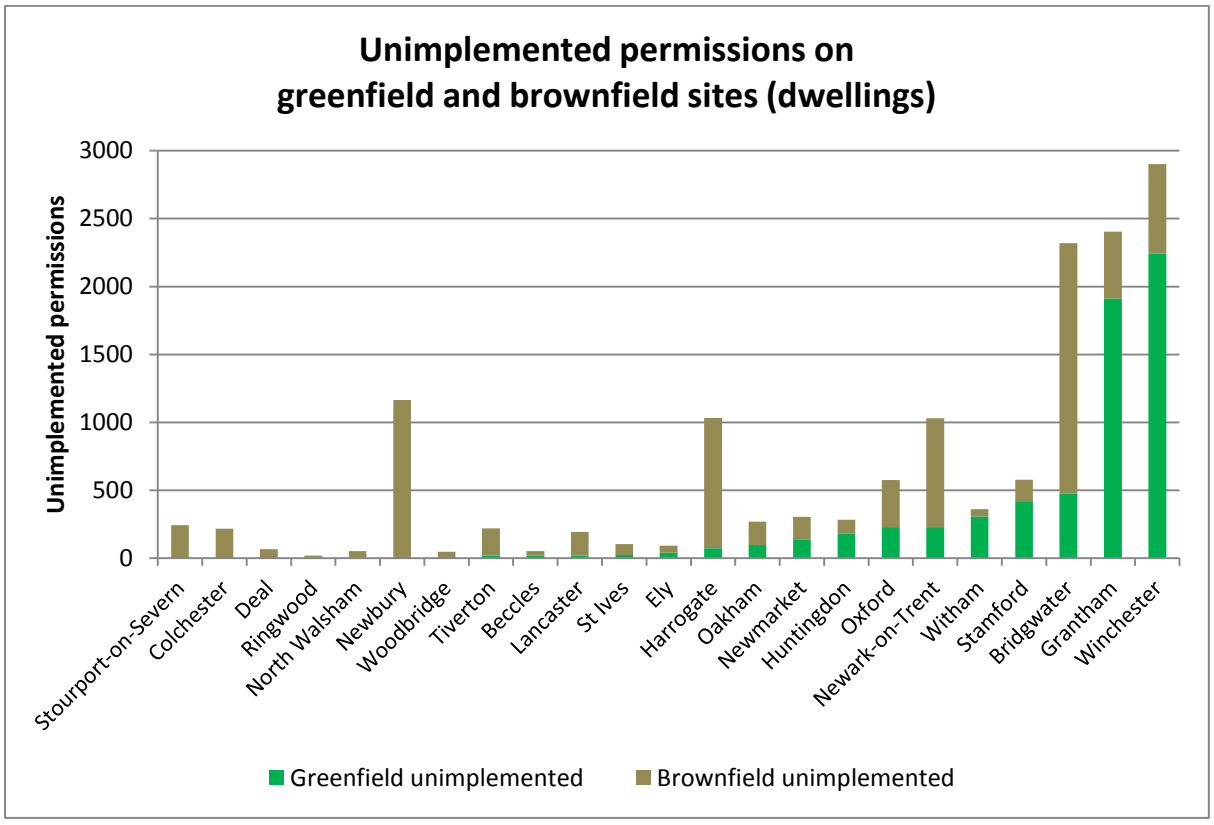
Figure 1



2.12 The data show wide variation in the scale of development immediately in prospect, from nearly 3,000 dwellings (in Winchester, largely due to a recently permitted greenfield urban extension – see Appendix 10) to negligible numbers. The scale of likely development is also highly variable in relation to the size of historic town. Whereas four towns in the 40-60,000 population range could supply over 2,000 dwellings each, Oxford (160,000) could supply just 576 and Colchester (120,000) only 216. The nine largest potential suppliers are spread across seven regions, suggesting caution should be exercised in drawing geographical conclusions. The most significant feature of the data is that all but one of the smaller towns (under 31,000 population) are in a tight group with few unimplemented permissions (under 400). This relationship between the variables probably reflects mainly the number of smaller towns in the sample, not so much their historic nature.

2.13 Data on unimplemented planning permissions for housing can be reliably distinguished between brownfield and greenfield sites at 23 towns in the sample. The results in Figure 2 are presented in order of towns with rising numbers of greenfield sites available (in the lower section of each column). This selection of towns is in part different from that used in Figure 1, usually due to different sources of information for the two purposes.

Figure 2

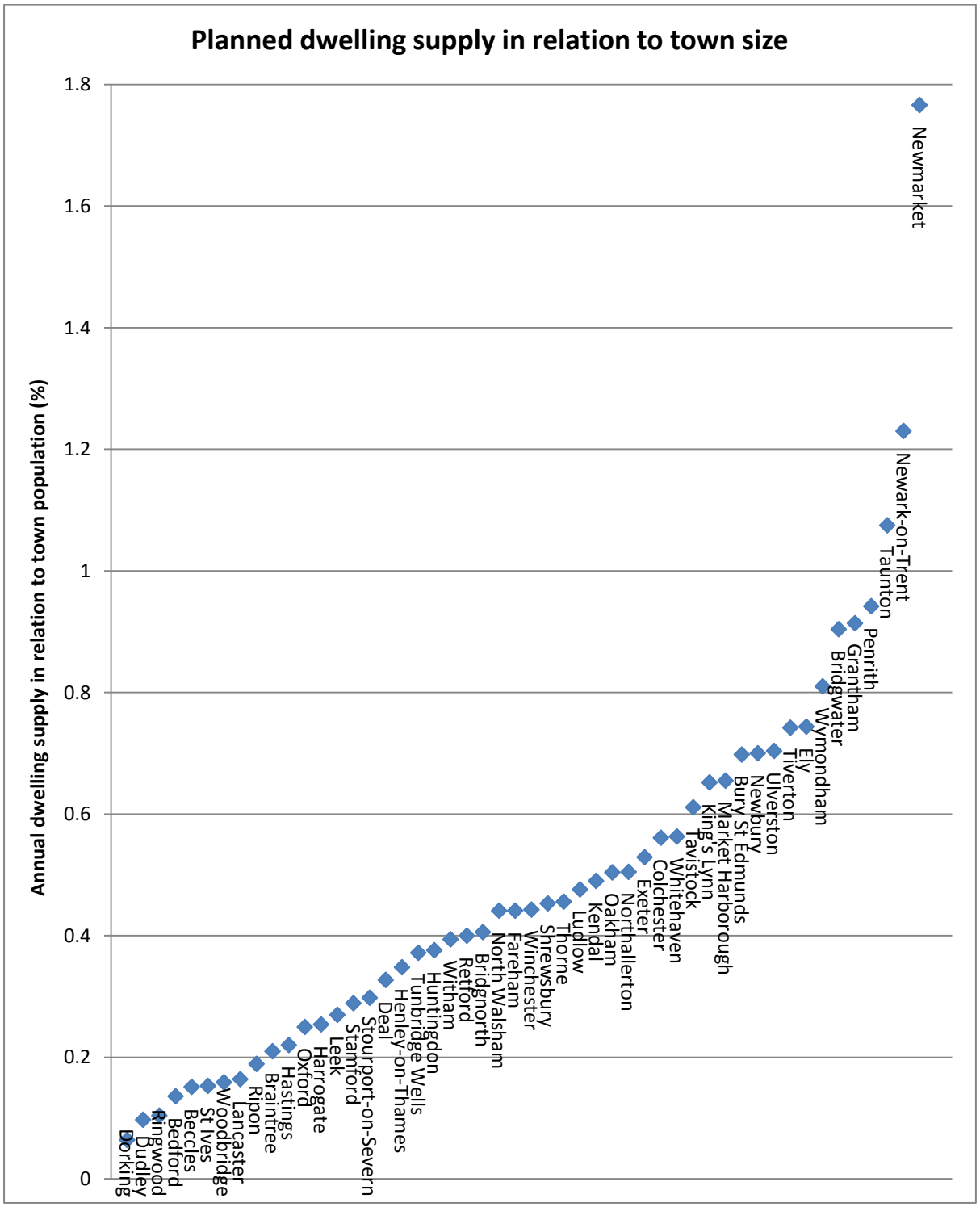


2.14 The column chart shows significant concentration of both brownfield and greenfield unimplemented permissions in a small number of historic towns. Over half the towns have unimplemented permissions for fewer than 300 dwellings. The numerous towns in the East of England with few unimplemented permissions on either greenfield or brownfield sites largely reflects their size (with the exception of Colchester). Together with Figure 1, the data suggest that major housing development is not imminent in smaller historic towns. In the larger ones, the scale of development feasible currently is highly variable: statistically there are unimplemented permissions allowing nearly 18 times the rate of development in Winchester as in Oxford, once the towns are standardised for population size, or over 30 times the rate proportionately in Grantham as in Colchester. Individual major planning permissions in a few towns are likely to be a feature in these disparities.

2.15 A similar exercise can be carried out on housing prospects over the next 5-7 years. Comprehensive information is available on total anticipated dwelling provision at all fifty towns (annually 2015-2020). In Figure 3 this is presented with the towns in ascending order

of anticipated proportionate growth: on the vertical axis, '1' means '1 dwelling every year for every 100 people in the town in 2011' (formally calculated as 'Annual dwelling supply planned for 2015-2020 x 100, divided by 2011 population'). In Figure 4 planned dwelling numbers are shown against town size.

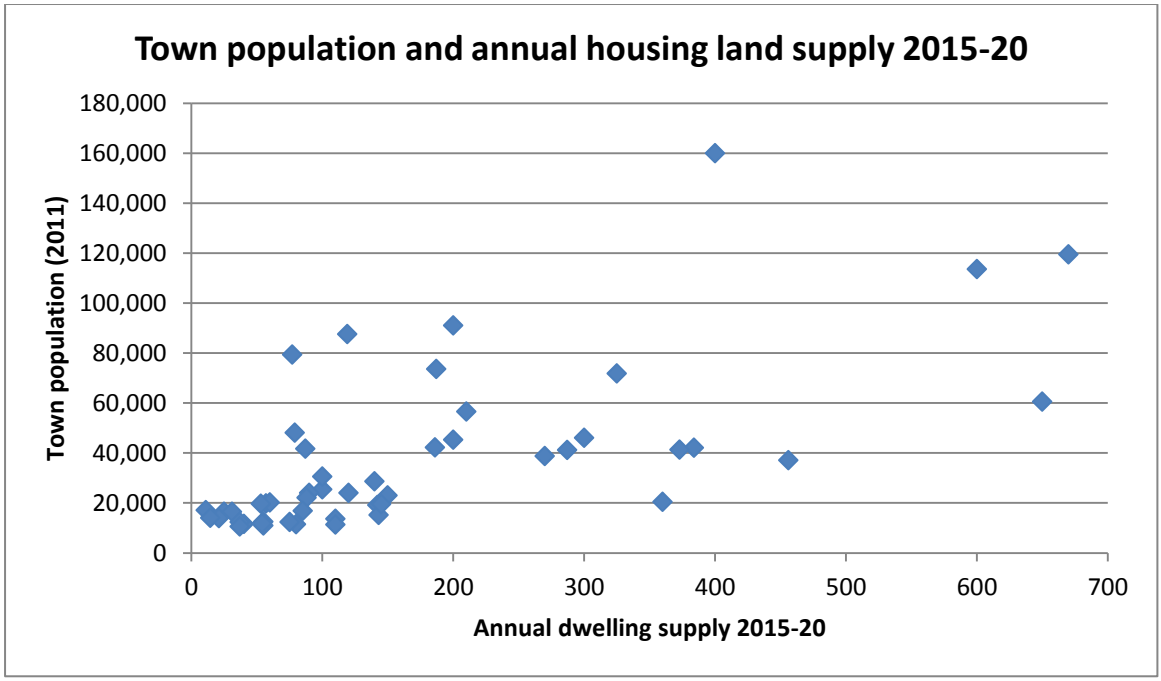
Figure 3



2.16 Figure 3 demonstrates that the scale of housing development planned in the next few years in historic towns is just as varied (in relation to towns' sizes) as with unimplemented permissions. The higher rates of planned development are often associated with urban extensions, and conversely there may be special reasons why other towns have relatively low planned development rates (e.g. Green Belt or protected landscape constraints, coasts, or closely confined administrative boundaries). The rate of planned development in Newmarket is 27 times that in Dorking after adjusting for size of population. The figures also show that proportionately towns in the West Midlands and especially the South East are concentrated in the lower rates of dwelling supply, while towns in the South West especially are concentrated in the higher rates of dwelling supply. Those tendencies do not appear to relate to town size. The data therefore hint that development expectations may be slightly greater in historic towns in the South West than elsewhere and more tightly contained in the South East, though regional sample sizes are very small.

2.17 Newark-on-Trent, Grantham, Taunton and Bridgwater all appear in the top eight providers of both planned dwelling supply and unimplemented planning permissions when adjusted for their populations. In the South East, Newbury has a higher proportionate expected rate of growth than any other town as well as the second highest supply of unimplemented planning permissions. Colchester in the East of England has a proportionately high planned rate of housing supply in marked contrast to its low rate of supply of unimplemented planning permissions.

Figure 4

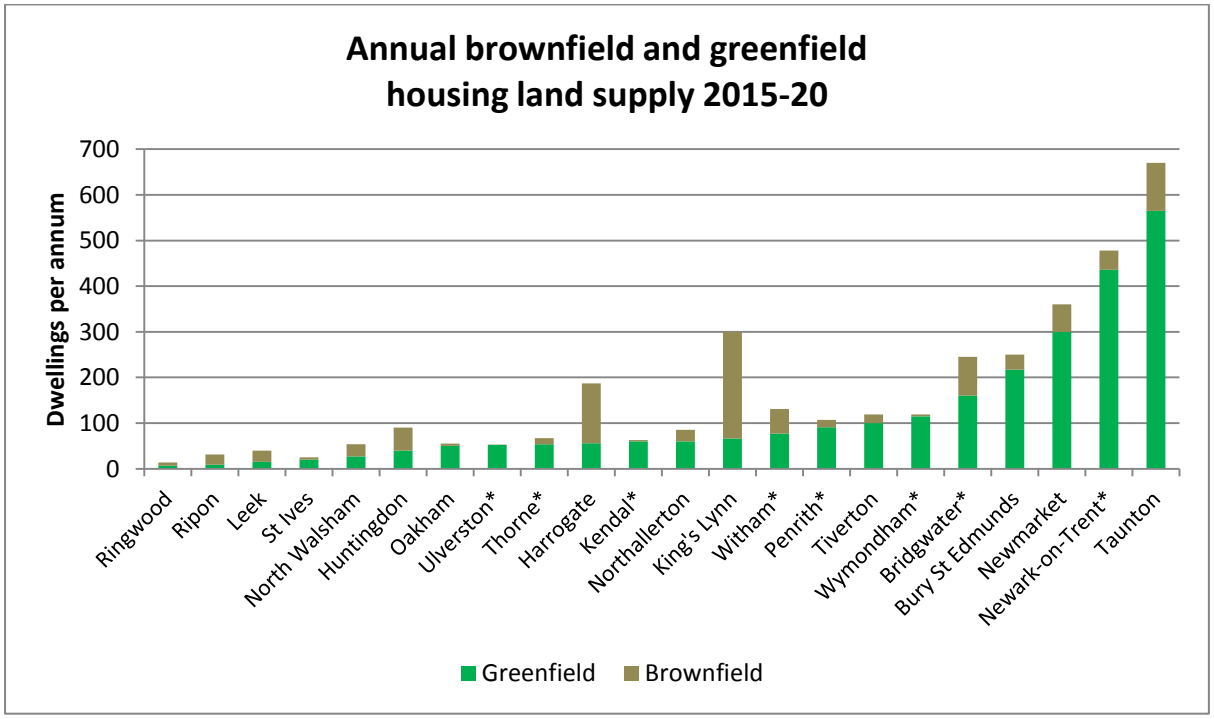


2.18 Figure 4 similarly shows that there is no clear correlation between historic town size and the planned supply of dwellings, though the concentration of towns having under 35,000 population with modest planned rates of supply repeats the picture identified for unimplemented planning permissions. Only Newmarket, a town of just over 20,000

population, has a substantially higher planned rate of housing supply (at 360 per annum), taking it to the top of the list of proportionate growth. However, Dudley and Bedford are both towns with around 80-90,000 population but have development proposals for only around 100 houses annually, which is a rate often associated with settlements one half or one quarter their size. The two largest rates of development involve building well over 600 dwellings annually, at Colchester (population c120,000) and – with twice the impact on its existing size – at Taunton (population c60,000). The wide scatter of towns around the graph cautions against drawing conclusions on trends even from this sample of 50 cases.

2.19 Information is available from 22 of the 50 authorities on the division of planned housing land supplies between brownfield sites and greenfield sites. This information was not usually stated in Core Strategies and had to be obtained from other documents, where the sum of greenfield and brownfield allocations did not necessarily sum to the Core Strategy figure. The results are shown in Figure 5, presented in order of towns with rising numbers of greenfield sites available (in the lower section of each column).

Figure 5



* The figures for these towns are derived from the same data source for greenfield and brownfield sites, although are not exactly compatible with the source used for total dwellings (in Figures 3 and 4).

2.20 The data show that proposed housing development is allocated predominantly on greenfield sites. In only three authorities of the 22 included does brownfield housing development exceed 100 dwellings per annum (Kings Lynn, Harrogate, Taunton), and in only five authorities does brownfield development exceed greenfield development (Kings Lynn, Harrogate, Huntingdon, Leek, Ripon). Windfall housing developments are likely to be omitted from the data, which would swell the brownfield component, though that omission is unlikely to change the pattern of results significantly.

2.21 Regional trends are difficult to draw from the available data. Not only do the figures vary considerably from one historic town to another, but the data include only one town from each of the South East and West Midlands (in contrast to all four Yorkshire towns and eight of the fourteen from the East of England).

2.22 Taken together, we conclude that the statistical findings on housing supply from the fifty historic towns examined show few trends. There is very considerable variation in the scale of housing development proposed either immediately or in the next five to seven years in the historic towns around the country. The scale of development anticipated at the smaller towns (10-35,000 population) is generally particularly small, both on allocated sites and through hitherto unimplemented planning permissions, though there are notable exceptions such as Newmarket. The evidence does not support the hypothesis that historic towns are necessarily facing the likelihood of substantial housing development, nor that large towns (which happen to be historic) are necessarily being expanded at a disproportionately fast rate. Greenfield allocations greatly exceed brownfield allocations for the years ahead, though the pattern is just reversed in respect of the supply of unimplemented permissions. However, the overall figures are influenced by a few significant cases. Regional trends are difficult to discern, and considerable caution should be exercised in view of the small number of towns representing each region of England. A tendency to a higher proportion of planned land allocations being made in towns in South West England is unlikely to be significant as an indicator for policy purposes.

2.23 This study has not had the capacity to investigate why each of the fifty historic towns possesses its own particular pattern of housing land supply, or the extent to which heritage is a factor in this. Nor has a review been possible of any aspirational scales of land release for housing (or other purposes), to encourage growth in areas wanting it, compared with modest allocations elsewhere in those towns aiming to resist the development of land for housing. Overall it is far from clear that the 'heritage' of the towns studied is a consistent deciding factor in explaining the observed pattern of housing land supply expected currently or in the next five to seven years. Assessments of individual towns would be needed to gauge that, rather than relying on statistical data across numerous towns (that is a subject of the twenty towns studied in chapter 3).

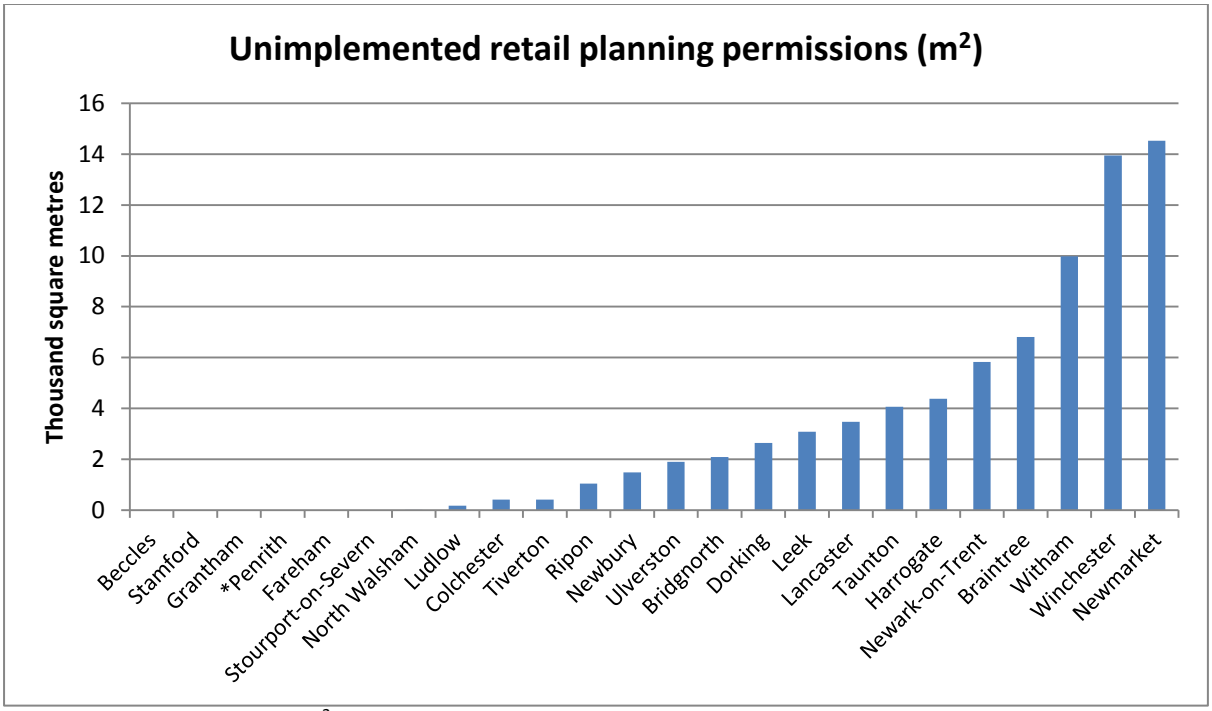
Retail development

2.24 Information on retail development was obtained from local authority monitoring reports and similar sources. There were relatively large numbers of authorities which did not respond to requests for information or did not have it readily available. On some occasions known schemes were not supported by floor area data and had to be omitted from graphical presentation. Floorspace was usually presented as a net figure where redevelopment of a retailing area was taking place. In a few towns the figures available may be known sites identified by the project, not the total figure for the category. Where floorspace ranges are offered, the higher figure is presented here. Data refer to all planned growth, not to a specific period or annualised.

2.25 Available information on unimplemented retail permissions is presented in Figure 6 from 25 towns (incl. six nil returns). Only four authorities were able to distinguish greenfield

from brownfield unimplemented sites, so this element of the analysis was dropped. Some local authorities pointed out that retail development had gone beyond the point of being land allocations and had recently been permitted or commenced on some sites. These would come on-stream shortly, effectively making them 'current' rather than future schemes. This applied to supermarkets in Wymondham (on 1.2 hectare site), Stourport-on-Severn, Ulverston (1900m^2) and Dorking (1286m^2 and 1356m^2); these are included in Figure 6 if floorspace information has been provided. A few other cases may have been permitted but are recorded under future proposals. The towns with the larger retail development proposals often coincide with those supporting the larger growths in housing supply.

Figure 6

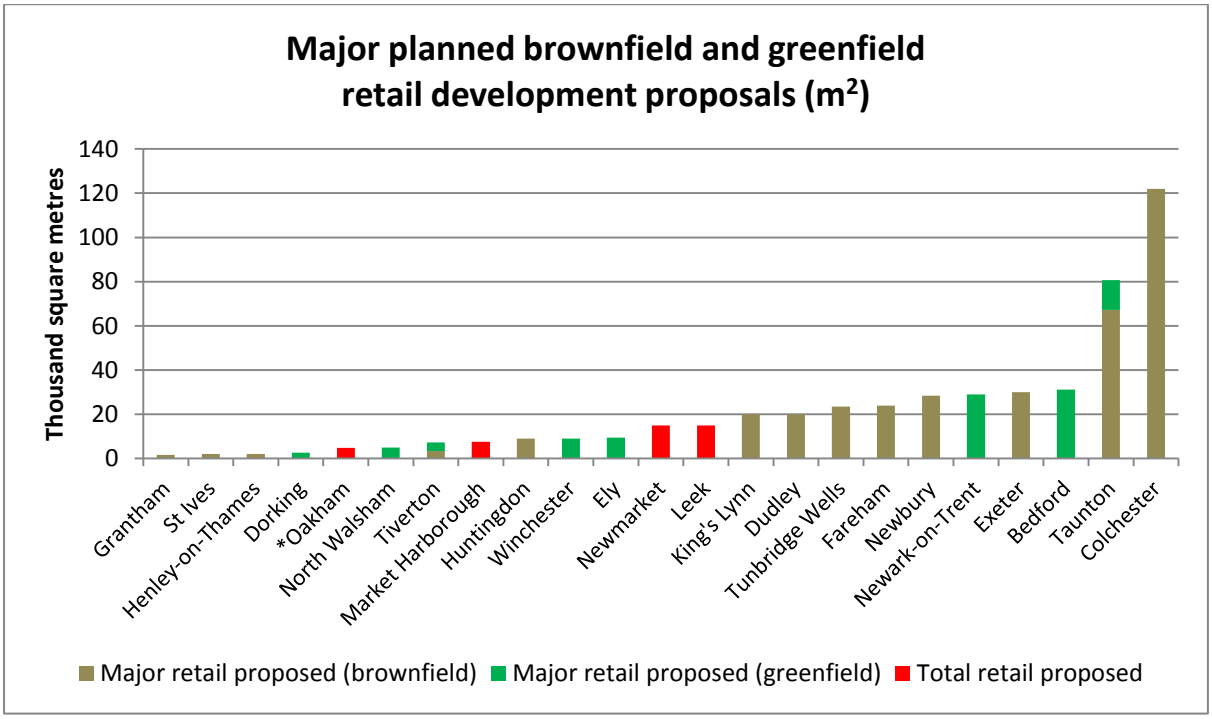


* Schemes totalling 92,800m^2 had recently been completed in Penrith. Permission had also been granted in Bridgwater for retailing on 4.5 hectares of land.

2.26 Planned major retail developments are recorded in Figure 7. Most of these are allocations, though in some cases the figures provided were so precise as to suggest permissions. Information was requested split between greenfield and brownfield sites. Most information related to only one category or the other: the omission from the second category was usually because the information was not available rather than because there was a known nil return, so the overall scale of future retail development may have been underestimated somewhat. For some towns only total figures were available (shown in red).

2.27 Figure 7 shows considerable variation in the scale of development proposed, led by schemes in two towns which aim to expand rapidly: Colchester and Taunton. All data provided have been included, though in some cases these clearly struggle to qualify as 'major' retail development schemes. No information was available from towns in the North West region and little from Yorkshire (Northallerton only). The evidence suggests that many

Figure 7



* Oakham had an additional 0.99ha allocation and Northallerton a 0.71ha allocation, both brownfield.

historic towns are looking to expand their retail offer rather than remain frozen in scale. The data show substantially more development on brownfield sites than greenfield sites, though whether this is nurturing historic town centres or challenging them would be a matter for local analysis. However, the only large scale greenfield schemes identified were in Bedford, Newark-on-Trent, and to a lesser extent Taunton, suggesting that peripheral expansion of retailing on this scale is unusual, even in association with significant urban growth.

2.28 Further conclusions are difficult to draw from the major retail proposals and unimplemented retail planning permissions identified. Major retail development has impacts on a town which last for many years, so there is a chance element in how they appear in the data: recently completed schemes would not have been counted at all, while unimplemented permissions and plan allocations reflect stages reached by schemes in this 2014 snapshot. The towns where major retailing is recorded may be focused in the wealthier towns, but this is difficult to confirm due to the quality of the data: an absence of data may indicate either a lack of activity or a lack of its availability to this project. Regional conclusions are similarly difficult to draw.

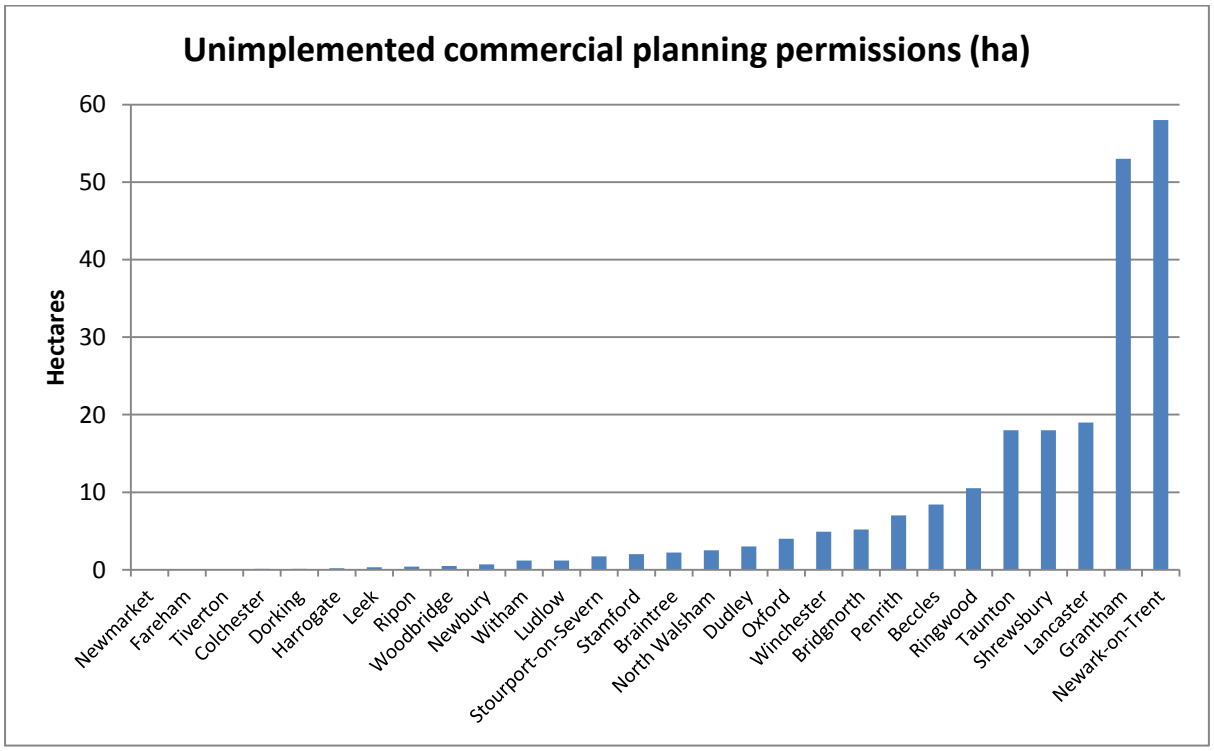
Commercial development

2.29 Information was available from 38 of the 50 towns on plans for major commercial development and from 28 on unimplemented planning permissions. The data presented is so far as practicable limited to new land allocations, and known pre-existing allocations identified in plans are excluded. This distinction is probably more reliable for greenfield allocations than for brownfield sites. Data are presented in hectares. Additional business

parks are known to be proposed in Braintree and Witham, but area figures are not available. Data refer to all planned growth, not to a specific period or annualised, and have been rounded where necessary to the nearest 0.1ha. Mixed use development has usually been included under commercial development, where this properly identifies the leading activity, though very few schemes notified to the study were identified as mixed use as such.

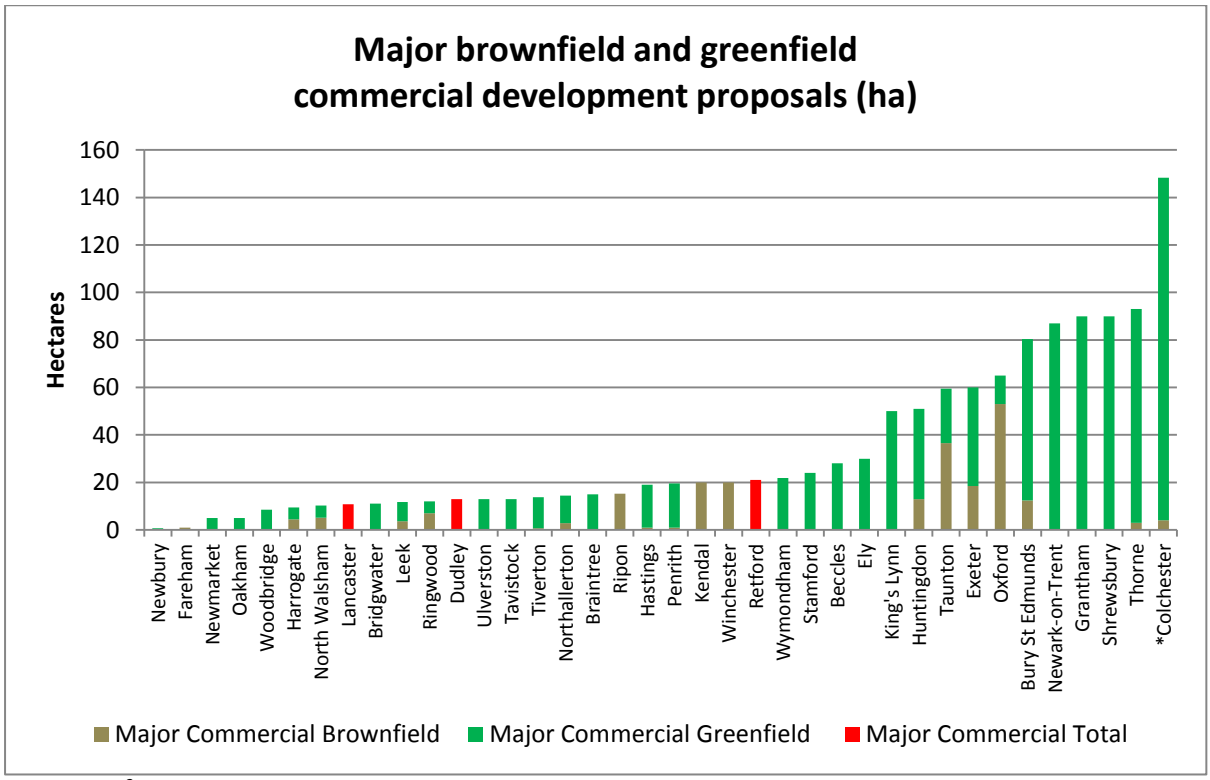
2.30 Unimplemented commercial permissions are identified in Figure 8, representing the scope for immediate development. Only two authorities were able to distinguish unimplemented permissions on greenfield and brownfield sites, so this part of the analysis was dropped. Newmarket, Fareham and Tiverton had nil or negligible unimplemented permissions, while those in half a dozen other authorities were extremely small. Figure 8 shows that only five authorities had over 10 hectares of unimplemented commercial permissions. The wide range of unimplemented commercial permissions, from nil to nearly 60 hectares, mirrors the experience with housing and especially retail developments, suggesting that there is no consistent pattern of current commercial development pressure on historic towns.

Figure 8



2.31 Figure 9 shows the major retail development proposals for which historic towns are planning. So far as practical, allocated sites already permitted have been recorded as unimplemented permissions and are included in Figure 8 alone. Local authorities were able to split allocations between greenfield and brownfield sites in 19 of the 50 towns. 16 more towns had specific greenfield allocations but the brownfield allocations were not available (and may have been nil). There were three further towns were total commercial development land was known but not the split between greenfield and brownfield sites (shown in red).

Figure 9



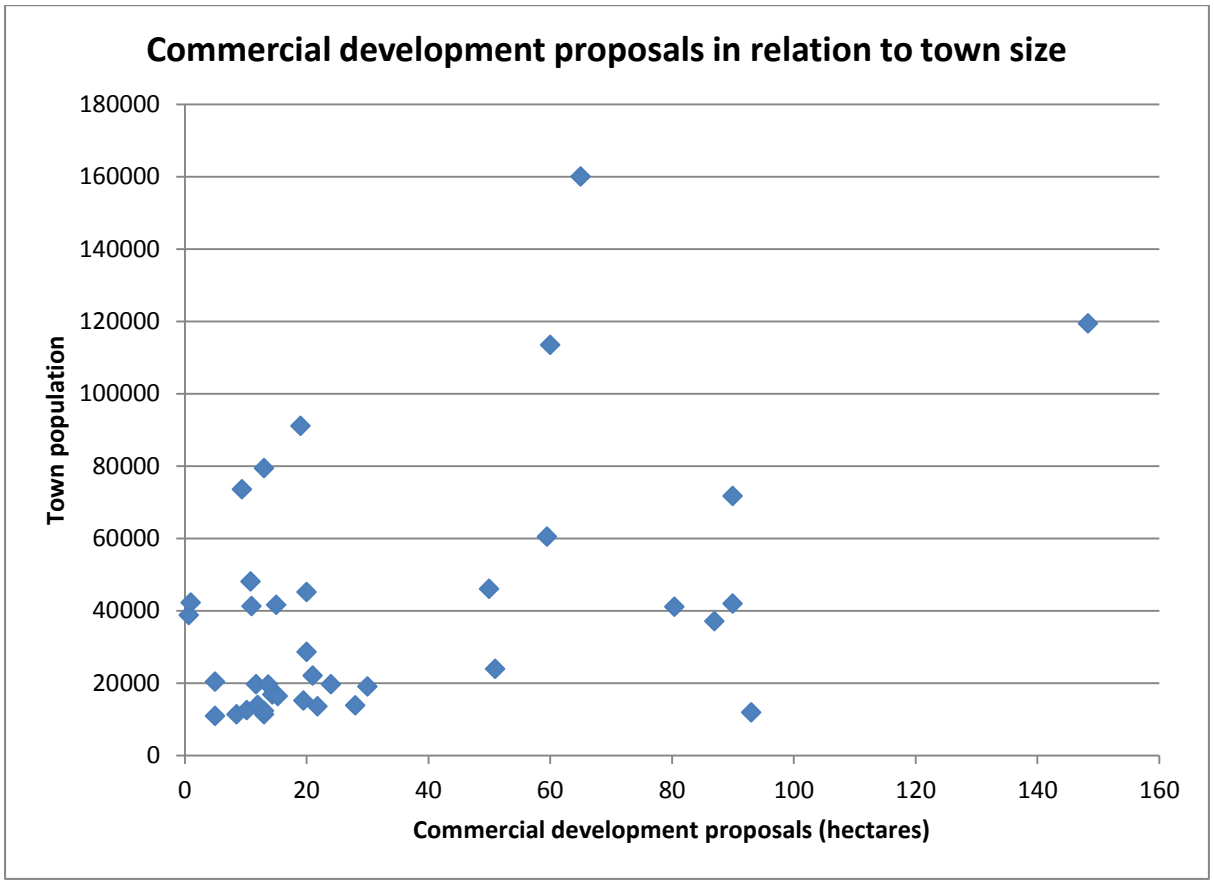
* 40,000m^2 of brownfield commercial development is proposed: this is likely to cover much more than 4ha.

2.32 The findings from Figure 9 show clearly that greenfield land allocations for commercial development substantially exceed brownfield allocations. The scale of these proposals varies between historic towns from negligible to over 140 hectares, with a fairly even spread between the extremes. No obvious regional trends are apparent. Thorne stands out as a particularly small town with a substantial allocation of land for commercial development. To explore that relationship in more detail, the total commercial development allocations in each town are presented in Figure 10 against the size of each town (population). This is not particularly reliable due to the potential omissions from the data of brownfield sites especially. Nonetheless, it shows that there is a very wide spread of data across the sampled towns without any clear trend. Additional data would be unlikely to alter that finding. As with housing development, most of the towns under 35,000 population are anticipating only small allocations of land for commercial development (less than about 30ha), with Huntingdon joining Thorne as an exception expecting much more.

Infrastructure development

2.33 Many towns are expecting infrastructure developments to accompany their growth plans or in a few cases to meet existing needs. On greenfield sites, sixteen towns were expecting improved transport infrastructure (principally roads), plus occasional schools, a leisure centre, a community stadium and a multi-purpose community facility. Bridgwater anticipated a new nuclear power station at Hinckley Point, a new hospital and strategic flood defences. Infrastructure planned on brownfield sites was more limited. Five towns expected capacity increases in transport infrastructure (e.g. road and junction widening, railway line reinstatement), while four expected new or relocated educational

Figure 10



establishments. No unimplemented infrastructure was apparent. There were no criteria for inclusion or exclusion from the list, so the items covered may not be compatible across all towns, but the findings do give a general impression of planned infrastructure.

Conclusions

2.34 The scale and type of development proposed in and around historic towns is highly variable. There is a core of smaller settlements (10-35,000 population) where only modest development of any kind is expected (with exceptions), but otherwise patterns in the data are elusive. Individual towns planning for substantial growth stand out in the analyses of housing, retail and commercial development. These include Colchester, Newark-on-Trent, Grantham, Taunton, Bridgwater, Shrewsbury and Bury St Edmunds. Very small sample sizes preclude reliable regional comparisons within the 50 historic towns studied, so the suggestion in the data that historic towns in the South West have slightly higher rates of planned dwelling supply is not significant for policy purposes. No other regional trends were noted, though in any event no towns from the North East met the criteria for inclusion in the sample and data from local authorities regarding towns in the North West were particularly few. Standardising the planned scales of housing and commercial developments against the size of each town confirmed the great variability between rates of development from one historic town to another.

2.35 The large majority of housing and commercial development planned for the next five to seven years in historic towns (measured by allocations identified in plans) is expected on greenfield sites. In contrast, the large majority of planned retail development affecting historic towns is proposed on brownfield sites. As housing is easily the largest user of land, followed by commercial development, the clear implication is that historic towns tend to face outward expansion where practicable, irrespective of any urban intensification proposed, and this has the potential to create conflicts with the settings of historic cores. A small majority of current housing development proposals (identified by unimplemented planning permissions) is on brownfield sites, but there is insufficient data on this issue for other development types.

2.36 The 'development pressure' facing each historic town varies greatly, whether for housing, retail, commercial or infrastructure development. The scale of development expected is not proportionate to the size of the historic towns in the sample. Other reasons than heritage are likely to be more important in explaining general patterns of observed growth. The significance of historic towns' heritage in the development choices made locally is likely to be better understood by the examination of experiences in individual cases.

CHAPTER 3

PLAN-MAKING FOR HISTORIC SETTLEMENTS

Background

3.1 An objective of the project is "To examine how much weight is being given to the need to safeguard the character and setting of smaller cathedral cities and prominent historic towns in the plan-making process." The research has gone somewhat beyond identifying the preparation and content of plans, and has tried to assess the weight given to those plans in decisions affecting historic settlements.

Making the planning system work for heritage

3.2 The role of plans – and of planning itself – has evolved considerably over the last ten years, so responding to the Brief must be put in an evolutionary context. The Planning and Compulsory Purchase Act 2004 introduced a new system of forward planning to shape development at the local level. The pre-existing approach had involved Structure Plans prepared by County Councils (in two-tier authority areas) and Local Plans prepared by District Councils to implement and put more detail into the broad policy set out in their Structure Plan. There had also been non-statutory Regional Planning Guidance to provide a wider strategic role, with which Structure Plans were expected to conform. The new arrangements abolished Structure Plans (and much of the County Councils' role in planning) and put regional planning on a formal statutory basis through Regional Spatial Strategies. All local authorities, including unitary authorities (who had previously prepared Unitary Plans – combining the features of Structure Plans and Local Plans), were now required to prepare Core Strategies and a suite of supporting Development Plan Documents (DPDs)as they thought fit. Supplementary Planning Documents could still be prepared, without the same scale of public scrutiny before adoption, similar to the preceding system.

3.3 The new forward planning system changed as it was put into practice, and substantial revisions were made to requirements in the Planning Act 2008. The transition from the former system to the new one took much longer than politicians had expected, and there was something of a hiatus as authorities decided whether to complete the preparation of plans started under the old system or begin afresh under the new one. Securing the adoption of a Core Strategy became a substantial undertaking, not least because of the greater emphasis in the new system on there being a thorough 'evidence base' to support policies. Preparing detailed DPDs, e.g. to allocate specific sites for specific purposes was often postponed, and only now, 10 years later, is this being achieved on a substantial scale across England.

3.4 On top of this procedural upheaval, the Coalition Government elected in 2010 abolished regional planning, leaving Core Strategies and their supporting documents as the only tier of planning below national policy. The numerous local authorities which have still not adopted their first Core Strategy are relying on Local Plans from the previous system, but those are becoming increasingly out of date. The Coalition also changed national policy substantially. A new all-encompassing National Planning Policy Framework (NPPF) was

issued in March 2012, subsequently supported since March 2014 by national Planning Practice Guidance. The consequences of the NPPF for forward planning were substantial, and policy towards heritage and other relevant policy areas was changed. Even those authorities which had adopted Core Strategies under the 2004 legislation now found that their forward plans needed further amendment to bring them into line with the new NPPF. Litigation around the meaning of the legislation and intentions of policy has further tended to increase the workload on all local authorities. At the same time the recession and serious cutbacks in local government staffing levels have affected planning and heritage teams, with the result that authorities are struggling to cope with their obligations. The NPPF aspiration that local authorities' plans (now confusing relabelled 'Local Plans') should be kept up to date has seemed optimistic, even though NPPF policy can have draconian consequences for local authorities which fail to achieve this (particularly in respect of housing land supply).

3.5 The effect of this upheaval on the research has been that:

i) the weight given to heritage in forward plans necessarily measures achievements in recent years (about 10 years was taken as the extent), which in most authorities for most of that period means plans approved under the pre-2004 forward planning system: this has largely been a study of the effectiveness of the old Local Plans;
ii) the focus of the research is on the likely future impact of the new forward planning system since 2004, but there is only limited practical experience of putting the resulting policies into practice and plan preparation itself is still an emerging process;
iii) only those local authorities with Core Strategies successfully found sound by their Inspectors and adopted since the publication of the NPPF can reliably be described as having up to date forward plans; scrutiny of historic towns and cities for this part of the research was therefore confined to those whose authorities had these recent plans in place – though inevitably they had had very little time to implement these plans;
iv) the research had to address as best it could the potentially distinct impacts at the town scale of (a) adopting a Core Strategy, (b) the NPPF and (c) the economic downturn 2008-13, all of which overlapped.

Methodology

3.6 A judgment had to be reached on the number of towns to study in authorities with post-NPPF Core Strategies and the depth of study in each case, within the research budget. When coupled with a desire for a spread of towns around England and knowledge of those authorities with suitable adopted Core Strategies, the Steering Group agreed that 20 authorities would be an appropriate number. The towns selected are those listed in Table 2.

3.7 The treatment of town-scale heritage in the forward planning system was studied in some depth in each town. This comprised an analysis of:

– the evidence base used to support current policy, which might comprise any combination of material such as Conservation Area Appraisal, Historic Characterisation, Landscape Character Assessment, Design Guidance and studies of individual towns;
– the treatment of the character and setting of the selected towns in local planning policy, centred on the old Local Plan policies (particularly the Saved Policies from them which have been applied in recent years) and including the use made of the evidence base

already identified; in some cases Supplementary Planning Guidance comprised both evidence base and policy;
- the weight given to these planning policies in planning decisions affecting each town, relative to other priorities in the authority;
- the policies in the adopted Core Strategy and any other Development Plan Document (DPD) relevant to the character and setting of the selected towns;
- the treatment of the selected town's heritage and setting in the Sustainability Appraisal of the Core Strategy and of any other DPD;
- the effect of the transition from Local Plan to Core Strategy, identifying any changes in heritage policies or in their relationship with other policies since the previous Local Plan;
- the political significance of town heritage in comparison with other issues as indicated in the local authority's Corporate Strategy or equivalent statement;
- any change to the way in which the selected town's heritage is treated which can be attributed to the National Planning Policy Framework.

Table 2 Towns studied for their plan-making processes

Town	**Local authority**	**Relevant Development Plan Documents**	**Date of Adoption**
Berkhamsted	Dacorum Borough Council	Core Strategy	Sep 2013
Chelmsford	Chelmsford City Council	Core Strategy & Development Control Policies Core Strategy & Development Control Policies (Focused Review) Chelmsford Town Centre Area Action Plan	Feb 2008 Dec 2013 Aug 2008
Chesterfield	Chesterfield Borough Council	Core Strategy	Jul 2013
Folkestone	Shepway District Council	Core Strategy	Sep 2013
Hastings	Hastings Borough Council	Local Plan	Feb 2014
Henley-on-Thames	South Oxfordshire District Council	Core Strategy	Dec 2012
Ilkeston	Erewash Borough Council	Core Strategy	Mar 2014
Leek	Staffordshire Moorlands District Council	Core Strategy	Mar 2014
Newbury	West Berkshire Council	Core Strategy	Jul 2012
Selby	Selby District Council	Core Strategy	Oct 2013
Stowmarket	Mid Suffolk District Council	Core Strategy Core Strategy Focused Review Stowmarket Area Action Plan	Sep 2008 Dec 2012 Feb 2013
Taunton	Taunton Deane Borough Council	Core Strategy Taunton Town Centre Area Action Plan	Sep 2012 Dec 2008
Thame	South Oxfordshire District Council	Core Strategy	Dec 2012
Thornbury	South Gloucestershire Council	Core Strategy	Dec 2013
Wellington	Taunton Deane Borough Council	Core Strategy	Sep 2012
Whitehaven	Copeland Borough Council	Core Strategy	Dec 2013
Wigan	Wigan Metropolitan District Council	Core Strategy	Sep 2013
Winchester	Winchester City Council	Core Strategy*	Mar 2013
Woodbridge	Suffolk Coastal District Council	Core Strategy & Development Management Policies	Jul 2013
Wymondham	South Norfolk District Council	Core Strategy** Core Strategy (Revision)**	Mar 2011 Jan 2014

* Joint with South Downs National Park Authority

** Joint with Broadland District Council and Norwich City Council: Greater Norwich Development Partnership

3.8 Documents required for analysis were usually obtained from local authority websites, though some had to be supplied by the authorities concerned. Information and views on the way in which the documents were used and interpreted, and the weight given by officers and councillors to heritage issues, were obtained by telephone interviews. The intention was to interview the Senior Conservation Officer in each local authority and a suitable representative of the voluntary sector body in the selected town which usually made the most substantive comments on heritage and planning issues (e.g. responses to consultations on development plans and comments on planning applications affecting heritage). This was broadly successful, though occasionally other policy staff were interviewed instead (or as well), and in a few cases there was either no voluntary sector body active on heritage issues in the town (Wellington, Ilkeston and Thornbury) or a representative of a suitable body refused to contribute to the research. A list of interviewees is provided in Appendix 1.

The evidence base on the heritage character and setting of the selected towns

3.9 The heritage interest in a town and its setting can only be reflected properly in policy if this has been articulated clearly at the outset. The study therefore examined the documentary evidence that each authority had available to it to assess the character and setting of the selected towns. A judgment was taken on whether or not to include in the assessment various documents which were marginal by virtue of their age or relevance. A few documents which did exist appeared to be little used. The results are listed in Table 3.

Table 3 Documentary evidence base by category (with dates published)

Town	Conservation Area Appraisal (incl. policies and management proposals)	Landscape Character Assessment	Historic Characterisation (incl. Extensive Urban Surveys)	Urban Design Guidance	Town Study
Berkhamsted	2004 & 2014	SPG 2004		2011	SPG 2004
Chelmsford			2006		
Chesterfield	2006	[2003]			2009
Folkestone	2005, 2011, 2013				2011
Hastings		2010	[2010]		
Henley-on-Thames	2005	SPG 2003		2008	
Ilkeston	2009	2003			2007
Leek	2013	2008	2010		2011
Newbury			2003		2013
Selby		1999			
Stowmarket	2011				2001 & 2008
Taunton	2007ff (4 of 10)	2011		SPD 2008	
Thame	2006	SPG 2003, 2009		2008	2014
Thornbury	2004	2005			
Wellington	2007	2011			
Whitehaven	2009	2011	2009		SPD 2012(2)
Wigan	2010		2012		
Winchester	2003	1994, 2000, SPG 2004	1998, 2004		1998, 1999
Woodbridge	SPD 2011	2008	2008	[2008]	2003 (part)
Wymondham	2001 & 2012	[2001 & 2012]	2009	SPD 2012	

Square brackets indicate that the document appears to be barely used for purposes relevant to this research

3.10 Table 3 shows that 15 of the 20 selected towns had Appraisals of their Conservation Areas and that 15 were covered by Landscape Character Assessments. There were specific studies of all or part of 11 towns which included a heritage element, 9 towns had Historic Characterisations or Extensive Urban Surveys to call upon and 6 had urban design guidance. All towns had at least one study available. The evidence base for preparing policy and for making planning decisions was for the most part sufficient and sometimes excellent (in Berkhamsted, Wymondham, Winchester, Leek and Whitehaven). Only in Hastings was it clearly poor (and the Extensive Urban Survey of the town, prepared in 2010 and available online, is not mentioned in any planning document). A number of authorities indicated that documents had been prepared specifically to support the preparation of Core Strategies. There have certainly been numerous categories of study appearing for the first time in the selected towns since the legislation for Core Strategies in 2004, though in the case of Historic Characterisation this largely reflects the application of an emerging approach to heritage rather than necessarily being triggered by preparation of a Core Strategy.

3.11 Concerns were also raised by interviewees in a few towns that the heritage resource itself was not adequately recognised. One notable suggestion made was that many more buildings in Folkestone should be listed and that this town deserved more Conservation Areas. Another was that the Conservation Areas in Newbury needed revision and the preparation of Conservation Area Appraisals for them as they were only lines on a map from as long ago as 1971. However there was no agreed timescale to implement this.

Local Plan policies on the heritage character and setting of the selected towns

3.12 Policies on protecting and conserving listed buildings, ancient monuments, conservation areas and other designated heritage features are commonplace in development plans, particularly under the old system of Local Plans. This research examined the extent to which local authorities were able to address the wider issues of settlement character, townscape and the setting of each town and its principal buildings. For the most part this involved the use of documents in the evidence base to inform policy, though in some cases the older Local Plans were themselves vehicles for setting out policies where the supporting text rather than a separate document provided the justification.

3.13 Most authorities in recent years have been reliant on 'Saved Policies' from their former Local Plans as part of their transition to a new forward planning regime. Some of these may well have been lost when a Core Strategy or other DPD was adopted, but numerous Saved Policies often remain in place until such time as new development management policies are adopted. In only two authorities in the sample, in Chelmsford City Council and Suffolk Coastal DC, had Core Strategies been adopted in which development management policies were included (in the latter case excluding heritage policies). The remainder were waiting for a further DPD, though few of these were expected soon. Decisions have therefore been taken against a changing background as the new forward planning system takes shape, including new Core Strategies and Area Action Plans (listed in Table 2). Also relevant are policies and supporting material in any Supplementary Planning Guidance (Supplementary Planning Documents under the post-2004 regime). Documents in the evidence base noted in Table 3 will be capable of being 'material considerations' where they are relevant to a decision. Table 4 summarises the dates of the old Local Plans on

which authorities for the 20 selected towns have relied, together with relevant statutory supplementary material. In some cases the former Local Plan policies have been central to heritage-related decisions whereas in others these policies appear to have had little impact at the whole town scale, as indicated in Table 4.

Table 4 Local Plan policies and key Supplementary Planning Guidance/Documents

Town	Policies or supporting text in Local Plan apply evidence	Supplementary Planning Guidance/Documents
Berkhamsted	2004	Landscape Character Assessment 2004; Development in Residential Areas 2004 and High Street & Water Lane, Berkhamsted 2007 both superseded by Urban Design Assessments 2006 & 2011 (not SPD)
Chelmsford	1997	
Chesterfield	2006	Chesterfield Town Centre Masterplan 2009
Folkestone	2006	
Hastings	[2004]	
Henley-on-Thames	2006	South Oxfordshire Landscape Assessment 2003
Ilkeston	2005	Ilkeston Masterplan 2007
Leek	1998	Leek Town Centre Masterplan 2014
Newbury	2007	
Selby	2005	
Stowmarket	1998	
Taunton	[2004]	Town Centre Design Code 2008
Thame	2006	South Oxfordshire Landscape Assessment 2003
Thornbury	2006	
Wellington	[2004]	
Whitehaven	2006	Town Centre and Harbourside 2012 Seeing the History in the View 2012
Wigan	[2006]	
Winchester	2006	Landscape Character Assessment 2004
Woodbridge	2006*	Woodbridge Riverside Planning Brief 2003 Conservation Area Appraisal 2011 Suffolk Design Guide for Residential Areas 2000
Wymondham	2003*	Place Making Guide 2012

* Local Plans particularly influential on heritage issues

Square brackets indicate that the document appears to be barely used for purposes relevant to this research

3.14 Local authority Conservation Officers and local voluntary sector representatives were asked whether local policies for about the last ten years have been sufficient for the task of protecting the character and setting of the selected towns. Supplemented by our assessments of the policies available, we conclude that most towns have had Local Plan policies (under the former system) capable of protecting the towns in this way, sometimes with excellent policies (e.g. Woodbridge). However, Hastings was poorly covered by suitable policies and the policies were limited in Folkestone, Taunton, Wellington and Ilkeston. Respondents also identified documents other than Local Plan policies which had been instrumental in benefiting the character and settings of the selected settlements. For example, particular benefit appeared to derive from the *Landscape Character Assessment for Dacorum* in Berkhamsted and *Conservation Area Appraisals* in Wigan.

3.15 Effective protection of the character and setting of historic towns depends on the effective implementation of heritage policies. The study asked local authority Conservation Officers and local voluntary sector representatives about how effectively these policies (and indeed the evidence base) were applied to planning decisions which would affect each town's heritage. The intention was to obtain an understanding of the weight given to heritage issues over the years, prior to the publication of the National Planning Policy Framework and prior to each authority's adoption of its Core Strategy. Where practicable, views were obtained on whether:

- Conservation Officers' advice was generally accepted by planning case officers and senior planning staff;
- councillors generally followed officers' recommendations on heritage issues, and
- Planning Inspectors supported heritage interests in cases which came before them (principally through planning and listed building appeals).

3.16 Most Conservation Officers presented their professional opinions on emerging plan policies (if consulted) and on proposed developments without regard to how this would be viewed by planning staff or councillors. Most were satisfied that their advice was generally followed by planning staff (though in two of these cases the voluntary bodies suggested this was not so reliably the case and the Conservation Officers were not people who moaned!). There were, though, a small number of authorities where the Conservation Officer was insufficiently engaged in the wider planning process (usually due to shortage of capacity) to be reliably aware of how their comments were treated by case officers or the decisions councillors reached.

3.17 There was a minority of authorities where the evidence suggested that staff did not press the case particularly strongly for the protection of heritage, resulting in weak compromises, such as poorly designed modern development in an historic context. This was clearly the result of a councillor-led culture in each of the towns, in which development was strongly encouraged and was not to be impeded unduly by heritage concerns. While in one case the Conservation Officer did not appear to argue the heritage case particularly strongly, the main problem lay with other planning officers. For example, voluntary sector interests in four different towns argued that:

- Officers were generally not making enough of the adequate heritage policy to press for good developments, and lacked confidence that their advice would be upheld in Committee. The key problem is that there never seems to be pressure to get better quality design. This is unlike some other authorities where applicants know they will have to try harder.
- The Council has not taken heritage or local historic character seriously in the past and it lacks technical expertise in its planning department. There are lots of older buildings in the town which desperately need repair, but good standards have not even been required at points of conversion. There have been some dreadful decisions where officers have recommended approval of very bad schemes and councillors have approved them.
- Officers do not seem to put forward recommendations to protect heritage buildings if the councillors would be likely to refuse these.
- It is unlikely that the Core Strategy or any emerging document will deliver protection of the historic environment or high quality design because officers do not demand it and

the Council itself is less concerned with good design than achieving some form of growth at any cost.

3.18 The research identified clearly that the driving force for the majority of councillors in most towns studied was the economic well-being of their town. Many councillors were also supportive of heritage interests, but the way in which the tensions affected decisions involving town heritage varied from place to place. The key determinant appeared to be whether councillors saw heritage assets as beneficial to the town's distinctiveness and economy or as a burden and drag on investment. Most councillors generally followed officers' advice on planning applications with an important heritage element, but attitudes and political views provided the backdrop to decisions. Insight into the numerous forces being played out was offered by many different interviewees, such as:

- There is a diverse membership of the Council, with goodwill towards heritage though not a huge sensitivity. Economic growth, affordable housing and traffic are the key issues for councillors.
- Far and away the emphasis of the Council is on growth through new build, both on the edge of town for housing and in the middle to bring retail and business to brownfield sites. Heritage has been further down the list: buildings have been preserved, but the public realm has been damaged.
- Councillors do not like to appear to be taking heritage seriously, but when it comes to the crunch they do take heritage interests as a valid point of view, and do compromise on decisions to a small degree. They realise the old buildings are part of the town's attraction. They see heritage as a good thing economically, attracting visitors, and regret notorious mistakes from the past.
- Over the years, insufficient weight had been given to protecting the town's character and setting. The problem was member-led: they had a strong growth agenda, 'whatever it is', didn't ask for higher standards, and were therefore not getting the best out of developments.
- Councillors do not get training and are not very interested in heritage, certainly where this impedes development. Fundamentally, there did not seem to be a long term and positive way forward for heritage, particularly at large and difficult sites, which would have fared much better in other authorities.
- There is a wonderful resource but it is unloved by Councillors who only view it as an expense. Only the Conservation Officer knows about heritage in the planning department, so the heritage message often does not get put. Staff cutbacks mean that an already very limited capacity is now extremely thin.
- In the last year there have been 3 or 4 appeals which the Council has defended after officers had originally recommended approval but councillors had refused schemes.
- The town is heavily Conservative, but newly elected councillors tend to be more concerned with economic growth and with relaxing planning controls. On the other hand some councillors are very conscious of heritage, though the political balance has shifted slightly away from them.
- In the last year or so there have been changes to personalities involved and councillors have treated heritage better.

3.19 The reporting of Inspectors' and Secretary of State's decisions was almost entirely in favour of heritage interests, with parties struggling to think of any heritage appeals lost or

any heritage appeals at all in some of the towns studied. One Conservation Officer reported that councillors had been reluctant to hold out by issuing the refusals officers sometimes recommended, though their concerns had been allayed by good appeal decisions when they had done so. A major decision in Berkhamsted had protected the town from a large land allocation which would have challenged the town's setting and character: Dacorum BC's omission of a possible development site at Ashlyns School from the Council's Core Strategy had recently been upheld after a challenge in the High Court. Similarly in August 2014 the Secretary of State upheld a refusal by South Norfolk DC of a 70-home scheme which would have adversely affected the setting of Wymondham Abbey (even though the Council could not demonstrate a five year housing land supply): this case was pursued vigorously by the Council and seen as critical to understanding the role of the NPPF towards heritage in the town.

3.20 In addition to asking interviewees about the effectiveness of their own local policies, the study briefly compared the relationship between heritage policy and heritage outcomes across the selected authorities. The expectation was that these would be closely related so that, for example, local authorities with policies highly supportive of heritage would be those which took decisions most sympathetic to heritage. The same cultural approach would underlie both sides of the relationship. Evidence shows that this relationship usually applied in practice but that heritage policy was not a wholly reliable indicator of outcome:

(i) As the paragraphs above show, personalities in the decision making system can have a discernible effect, and this is to some extent irrespective of policy.

(ii) Councillors do respond to the pressure of local opinion. In Chelmsford, Hastings and Folkestone new voluntary organisations had sprung up in the last few years in part (or entirely) to tackle what they saw as their local authorities' inadequate regard to local heritage, and they presented evidence that outcomes were changing as a result (albeit usually more slowly than they would have liked). That had been separate from any change in policy.

(iii) One local authority for a selected town with a poorer record of attention to heritage had apparently recently improved its performance on heritage issues in order to bring itself more closely into line with standards in a neighbouring authority with whom it was developing a close functional association.

(iv) Stowmarket is a town with in our view a good evidence base and valuable heritage policies but unreliable outcomes. In 2008 a *Stowmarket Environmental Assessment* was commissioned specifically in anticipation of further major growth in Stowmarket (see Box 1). This was critical of the bland and poorly planned modern development which had engulfed the town in the recent years, and made recommendations to ensure that future development did not repeat this and tackled current deficiencies. The Stowmarket Area Action Plan adopted in February 2013 contains some excellent policies for heritage including to protect the skyline of the town on its slight ridge, with the onus on developers to enhance the town's setting and maintain distant views across the valley. An attempt was made to allocate development to places where it would do least environmental harm while remaining accessible, though the advice of the *Assessment* was not always followed: land allocations are closer to Onehouse village, employment land to the south east not constrained to the 35m contour, and land between Union

Road and Finborough Road proposed for consideration in the next review of the AAP despite the *Assessment* stating "there is little to no potential for development in this area". The Plan accepts "The development proposals will have a major effect on the character and appearance of the land to the North and North-West of the town. Although this land may have less landscape constraints than the River Gipping and Rattlesden valleys and the designated Special Landscape Areas elsewhere, its character remains important". In our view, adverse impacts on the setting of the town from the proposed scale of growth appear inevitable, and there is a gap between the aspirations of the heritage policies in the AAP and the likely reality of planned development.

3.21 We conclude that the evidence from across the 20 selected towns shows that in recent years most local authorities have had adequate or good evidence to shape policies and planning decisions affecting towns and their settings. The policies in most former Local Plans have provided some basis for heritage planning at the whole town scale, progressively supplemented by newly emerging DPDs under the new system. Rather than the adequacy of evidence or policies, it is the implementation of these policies which has been more variable across the selected towns. Advice from planning officers is usually sympathetic to heritage issues but not always. Councillors' opinions on the relative weight to give to heritage varies widely, creating climates of expectation in local authorities about how much attention should or should not be paid to this subject. Councillors are generally supportive of their officers, but there has nevertheless been concern about the loss of and damage to heritage in many of the selected towns, particularly as expressed by voluntary sector interests there. It is clear that securing appropriate planning policies for the townscape and setting of towns, like other heritage, is necessary but not sufficient: corporate attitudes to heritage are a key matter which also needs to be addressed.

Core Strategy policies on the heritage character and setting of the selected towns

3.22 Policies in Core Strategies can be expected to shape the heritage character and setting of the 20 towns studied in the years ahead. The study set out to identify the relevant policies and establish whether these were up to the task. The attention given to heritage at the whole town scale in the Sustainability Appraisal of the Core Strategy was also assessed, to see how significant a role this played in the plan as a whole. This exercise was repeated for all Development Plan Documents relevant to the selected towns.

3.23 The principal difficulty in this exercise is that Core Strategies tend to avoid offering their heritage policies in any detail. Core Strategies may have as few as a dozen policies, and these are necessarily 'high level', presenting a Council's general approach to issues rather than practical steps which will be taken in individual cases. The built heritage is likely to be mentioned sympathetically, and the protection of heritage interest within towns may also be mentioned, but the phraseology tends to be aspirational rather than practical, and therefore open to interpretation in individual cases. Nonetheless, Core Strategies make specific reference to protecting the settings of the following selected towns: Berkhamsted, Chesterfield, Hastings, Leek, Selby, Thame, Thornbury, Whitehaven, Winchester, Woodbridge and Wymondham. These encouraging findings show what is possible despite the limitations of Core Strategies containing only strategic policies.

3.24 Detailed heritage policies have yet to be put in place under the post-2004 forward planning regime in every town selected except Chelmsford. Elsewhere, suitable Development Management policies are awaited in a yet-to-be-adopted DPD. In some cases these have yet to be begun. As a result of the slow pace of formal plan preparation, most local authorities are relying on Saved Policies from their former Local Plans to provide the detailed policy approach to heritage, and therefore the overall policy picture has not so far changed greatly in many of them. The interviews detected some feeling that it is these policies, and not those in the Core Strategy, which have real effect in planning decisions. As an illustration of the difficulties, there is a hiatus in Hastings, where there are no worthwhile development management policies from the former Local Plan to fall back on: although the Core Strategy contains a formal commitment to the preparation of a historic environment strategy within 3 years, which is very necessary, this is not currently being promoted. Preparation of a Development Management DPD has fortunately begun which will include heritage policies. Table 5 shows the impact on heritage policies in the selected towns of the transition from the former Local Plans (and Unitary Development Plans) to the new forward planning system.

Table 5 Heritage policies in the transition to post-2004 forward planning

Town	**Previous policies continued with little change**	**Strategic policy only provided**	**Reliance also on Saved Local Plan policies**	**New policies introduced**	**Former Local Plan policies cut**
Berkhamsted		Yes	Yes	New 'place' strategy for the town	
Chelmsford	Yes				
Chesterfield		Yes		New town centre policy	Yes
Folkestone		Yes	Yes		
Hastings		Yes	Yes (but weak)		
Henley-on-Thames		Yes	Yes		
Ilkeston		Yes	Yes		
Leek		Yes		New policies for Leek and settings of settlements	Yes
Newbury		Yes		New policy on Historic Environment & Landscape Character	
Selby		Yes	Yes		
Stowmarket		Yes	Yes		
Taunton		Yes	Yes (but weak)		
Thame		Yes	Yes		
Thornbury		Yes	Yes		
Wellington		Yes	Yes (but weak)		
Whitehaven		Yes	Yes		
Wigan		Yes	Yes (but weak)		
Winchester		Yes	Yes		
Woodbridge	Yes		Yes		
Wymondham		Yes	Yes		

3.25 The heritage policies in Core Strategies are not the only ones which affect the future heritage interest in the selected towns. Many other policies, especially those prescribing scales of development, will also be important. Some Core Strategies explain how development is expected to proceed with regard to heritage, but others do not, so the priorities and methods of implementing policy – key to effects on the ground – may be unclear or postponed for decision on a future occasion. As one local voluntary organisation representative put it, their Core Strategy was just "a pious amalgamation of a lot of idealism which you could argue is incompatible". Some of the selected towns had adopted Core Strategies which set out very substantial scales of growth (Taunton, Stowmarket, Wymondham, Chelmsford, Ilkeston and Thornbury) with urban edge greenfield developments in each case. At the other end of the scale, Woodbridge is expected to grow by barely 3% over the next 10 years (see Box 1). There are consequently enormous variations in the ease or difficulty with which the heritage interests in the various towns can be protected, according to the scale of development planned.

Box 1 Planned housing growth in selected towns

The population of Wymondham grew from 10,869 in 1991 to 12,536 in 2001 (13.9%) and again to 14,405 in 2011 (14.9%). The Joint Core Strategy for Broadland, Norwich and South Norfolk allocates 2,200 dwellings to Wymondham 2008-26, which will increase its dwelling stock by about one third (or approaching 20% in 2011-21). Additional employment land and infrastructure are proposed.

The population of Stowmarket grew by 14% 1991-2001 and from 15,059 to 19,280 between 2001 and 2011 (28%). The Mid Suffolk Core Strategy establishes further growth of 1,925 dwellings 2010-25, which is equivalent to around 15% growth over a ten year period.

The Taunton Deane Core Strategy allocates at least 13,000 houses and 9,500 jobs to Taunton in the period 2011-28. This would increase the size of Taunton by over one quarter in just ten years (2011 population of 60,479).

Ilkeston is allocated 4,500 dwellings for the period 2011-28, including 2,000 at a former steelworks site 4km to its south. The allocation would increase the size of the town by about 15% in 10 years (2011 population of 38,640).

The Suffolk Coastal Core Strategy 2010-27 allocates 1,520 new dwellings (excluding windfalls) to five market towns in the area, of which Woodbridge is one. Woodbridge had a population of 11,342 in 2011, so it would grow by only about 3% over 10 years if it took an equal share of the 89 dwellings annually.

3.26 It is the intention of the post-2004 forward planning system that local planning policies should be held within a folder of separate documents which together comprise the development framework for the area. Table 2 above showed that there is a range of relevant documents affecting the selected historic towns, and there can be no surprise that heritage-related policies are spread around these. The policies must be judged by their combined effect. We came to the following views:

- The Chelmsford Core Strategy policies are very sympathetic to heritage, in the context of major growth. They are compatible with the Town Centre Area Action Plan where proposals are strongly tied to the character of localised areas and based on a sound

understanding of the historic background to Chelmsford's urban form. Development opportunities are assessed against urban design requirements. Many of the proposals are Town Centre-wide, and there are frequent references to settings.

- The Mid Suffolk Core Strategy is slim with generalised policies but its objectives refer to sustaining the character of towns. This is of limited practical use for the purposes of this study, but the recent Stowmarket Area Action Plan is much more sympathetic to heritage issues.
- The Environment Policy in the Taunton Deane Core Strategy is mainly about biodiversity but contains two generalised bullet points relevant to the built environment, though these do not amount to a robust heritage policy. The earlier Taunton Town Centre Area Action Plan pays remarkably little attention to heritage, though some small entries were added under pressure from English Heritage. 2,000 dwellings are proposed in the Area, and the outlook for heritage interests is not guaranteed.
- A Core Strategy policy sympathetically addresses townscape and the historic environment of Wymondham. This is supported by an emerging Wymondham Area Action Plan which in its current draft is fairly sensitive to heritage issues. Development would satisfy Core Strategy growth levels without directly damaging the historic core.

These cases illustrate the range of attitudes shown to town-scale heritage, and especially in the Stowmarket case show the importance of considering adopted plans as a whole.

3.27 Policies in development plans are expected to be compatible with each other and also achieve broader 'sustainability' objectives. As an example, plans should be able to demonstrate that their built heritage policies will be reinforced by other policies such as for urban growth, and that collectively the policies will support wider heritage objectives such as the protection of the character of historic towns. The negative effects of draft Plan policies on the historic environment can be avoided or reduced, and the relative merits of different scenarios for development and town expansions considered. The process of Sustainability Appraisal (SA) provides the means of doing this. The study examined the SA Reports for all Core Strategies and other adopted DPDs to see whether this was done and the impact it had on policy. Table 6 presents the results for Core Strategies. It shows that Sustainability Appraisals had tried to consider the effects of Plans' policies on heritage or the historic built environment in almost all cases, and that whole town qualities of the selected towns (e.g. townscape, town character, distinctiveness, sense of place or setting) had been addressed in two thirds of them. In most cases this was achieved by a town heritage evaluation criterion rather than simply by a review of a heritage policy. Whilst these are encouraging findings in principle, there were mixed levels of attention to the topic and often weak or absent conclusions and recommendations to feed back to the Plan.

3.28 Of the Sustainability Appraisals of other DPDs, the SA of the Stowmarket Area Action Plan was notable for its attention to the town's heritage as a whole. It concluded "The highest rating was achieved against the SA objectives aiming to conserve and enhance the quality and local distinctiveness of townscape and to revitalise the town centre, which reflects the key targets of the AAP." It recommended that a particular policy should contain more detailed information about heritage assets in relevant planning applications: this was incorporated through Main Modifications (themselves subject to further SA), specifically citing the requirements of the NPPF. The SA of the Taunton Town Centre Area Action Plan was also worthwhile. This identified damage to unknown archaeology as the principal risk

Table 6 Commentaries on Sustainability Appraisals of Core Strategies

Town	No significant reference to whole town heritage or town setting in SA	Relevant CS policy on townscape or setting evaluated	Town setting or whole town heritage used as SA criterion for assessing CS policies
Berkhamsted			Town character (not setting) included in cultural heritage criterion, but not specific to Berkhamsted.
Chelmsford			Excellent evaluation criteria & adequate baseline assessment, but weak policy evaluation.
Chesterfield	Heritage included within Cultural Heritage only		
Folkestone			Exemplary heritage criterion but not applied searchingly*, and no built heritage recommendations
Hastings	Townscape embedded in 1 of 21 evaluation criteria, but analysis very weak.		
Henley-on-Thames	Growth options assessed only against sustainability objectives on high quality design & distinctiveness		
Thame			
Ilkeston			Criteria to protect built environment and heritage landscape/setting: positive outcome for heritage as identified sites have negligible assets
Leek			Criterion to protect sense of place, character of townscape, etc.: around Leek sites have little impact on heritage; development reusing heritage assets in town centre would strengthen character
Newbury	Historic environment given high priority in assessment but not town heritage		
Selby	Landscape and character only assessed generally		
Stowmarket			Some townscape evaluation as part of heritage; negative effects of town growth noted. Setting neglected.
Taunton			Thorough commentary with criteria on sense of place, distinctiveness, townscapes, heritage character, etc. but offers no conclusions
Wellington			
Thornbury			Criteria included historic character: all sites around town assessed against this.
Whitehaven		Whitehaven Town Centre policy scores highly against key conservation objective	
Wigan	Landscape character and built environment only assessed generally		
Winchester			Criteria assess city core (built heritage) and setting (character & landscape) but fairly weak findings
Woodbridge			Plan policies score highly on distinctive townscapes sustainability objective, but SA critical of retail & archaeology policy
Wymondham		Town's heritage value discussed; townscape/historic environment policy reviewed weakly.	

* Conclusion that there will be 'significant positive effect' on the baseline relies on saved policies from 2006.

from the Plan; it picked out specifically the impact of the proposals on historic assets and on the landscape setting of the town with its church towers; and it pointed to the need for good design during development. It made recommendations to overcome identified difficulties which appear to have been accommodated in a revised Plan, and English Heritage objections at an early stage of the Plan were to some extent mitigated. These examples show how the SA process is intended to operate, with changes accommodated through an iterative process of plan preparation.

3.29 Overall we conclude that Core Strategies alone contain insufficiently detailed heritage policies to ensure satisfactory outcomes in relation to other policy pressures, though they do provide a platform for aspirations to protect the settings and characters of historic towns. Other Development Plan Documents, particularly Area Action Plans, can provide more detailed heritage policies where development is planned in a heritage setting, though experience in taking up these opportunities varied. The Sustainability Appraisal process varied greatly in quality from one plan to another. SAs were often carefully structured but did not achieve the full evaluation that might have been hoped for. Some highlighted achievements and shortcomings in the Core Strategies in relation to heritage, and in varying degrees in relation to town character and setting, though others had weaker evaluations. They often failed to follow through the information obtained with sufficient conclusions or recommendations to gain the full potential benefit from the evaluation process, and the benefits were small for the scale of the undertaking. However, the better SAs showed what could be achieved.

The effects of the transition to Core Strategy policies

3.30 The experience of how heritage policy has been applied in the selected towns in recent years will only provide some guide to the future if past policies are continued into the new forward planning regime. At the same time, the preparation of new policy provided the opportunity to make changes, whether to reflect the climate of opinion towards heritage in a town or to take forward a different approach. The study enquired of local authority Conservation Officers and local voluntary sector representatives how they viewed what had happened in the plan-making process. This section presents findings on changes of policy direction in the Core Strategy process.

3.31 Table 5 showed that the process of preparing Core Strategies had tended to result in past policies on whole town heritage being continued through the Saved Policy mechanism. To expand on the findings, interviewees were asked whether the Core Strategy had aimed to change the direction of policy on the relationship between heritage and growth. In the large majority of cases the previous policy approach had been continued and there had clearly been no change of direction. In a few cases minor changes of direction were noted. However, in four authorities there had been discernible changes to the treatment of the issue and in the South Oxfordshire towns Neighbourhood Plans had taken the lead role following the adoption of the Core Strategy for the district in 2012.

3.32 In Leek the preparation of the Core Strategy dovetailed with a Leek Masterplan SPD. This was seen as an opportunity to take a different approach to heritage protection using Staffordshire Moorlands DC's comprehensive and robust evidence base. The Core Strategy

policies relating to the historic environment are not particularly detailed but are based on historic characterisation and in Leek include "protecting and improving the setting and historic character of the town". It remains to be seen how heritage assets and the setting of Leek will be protected by the proposed Design SPD, Conservation Area Management Plans and indeed the Site Allocations DPD (which will be informed by the Landscape and Settlement Character Study).

3.33 In Chesterfield the Core Strategy made a fresh start to heritage with extra policies at the request of English Heritage. The very detailed development management policies for heritage and design in the 2006 Local Plan were dropped, though the importance of Chesterfield's medieval street pattern and of particular views and the setting of the conservation area will remain relevant. Instead the new Core Strategy takes a different approach which is to protect heritage assets that enhance the quality of the borough and improve those that detract. A new policy advocates innovative building designs albeit that development should respect character, form and setting of the surrounding area, and another protects views of St Mary's church with its twisted spire. Heritage-related SPDs are proposed or in preparation.

3.34 In Selby, the Council observed that prior to the Core Strategy there was a general perception that development was inappropriate in conservation areas and that listed buildings could not be altered. The Core Strategy recognises that growth can be acceptable in Conservation Areas but that new development must be well designed. This is offered as a more 'rounded view' which sees heritage as a facilitator of high quality new development rather than a constraint on growth. This is in the context of Selby having a positive Core Strategy policy on the setting of the Town Centre Conservation Area and Selby Abbey.

3.35 Officers in Thornbury advise that considerable attention was given in the Core Strategy to meeting growth requirements: this was at the expense of the heritage to some degree, notably at Park Farm on the north side of the town, but that this was outweighed by the need to maintain services and facilities and the benefits that these would bring to the town as a whole. Environmental protection remains an important part of South Gloucestershire's strategy. Details are given in paragraph 3.42 as this was principally a response to the National Planning Policy Framework.

3.36 We conclude that the overall effect of the change to Core Strategies was only limited impact on heritage policy. In most local planning authorities there was no real change, with the approach adopted only adjusting to the needs of the new regime. Core Strategies are more strategic documents than the Local Plans they supersede, so some authorities took the opportunity to revise their strategic approach and move their focus away from traditional development management policies. An improved evidence base on heritage issues usually underpinned this, representing a real advantage of the new system. Most of the policy changes aimed to improve the approach to heritage and in only one authority was the primary objective to facilitate more urban growth than previously. That was spurred in part by the recently issued National Planning Policy Framework, though reflective of local needs and still in the context of a commitment to heritage protection.

The impact of the National Planning Policy Framework

3.37 The heritage towns for this analysis were selected primarily because they were located in authorities with Core Strategies which were adopted after the issuing of the National Planning Policy Framework (NPPF) in March 2012. This provided an opportunity to identify changes to policy which had been introduced specifically to meet NPPF requirements. There was an expectation that these would be important considerations facing all local authorities in future and therefore, potentially, the impact of urban growth on historic towns. A range of effects was investigated.

3.38 First, three authorities from the selected twenty had adopted Core Strategies prior to the NPPF and amended them after the NPPF. In the case of the Joint Core Strategy for Broadland, Norwich and South Norfolk, the amendments were primarily to reflect the outcome of a High Court challenge to the document, not the NPPF, and this case has been discounted. Both Chelmsford and Mid Suffolk Councils carried out Focused Reviews to update their Core Strategies to ensure compliance with the NPPF. In Chelmsford the heritage policies were barely affected and therefore carried forward. In Mid Suffolk, further detail is included on development proposals in Stowmarket, but heritage does not feature in this. The English Heritage consultation response to the Mid Suffolk draft Focused Review welcomed a reference to new development respecting historic views and assets, landscape and townscape, and that the policy now required development to make a positive contribution to local character. However, those references disappeared from the adopted policy. The overall effect was that the NPPF had no impact on updating earlier Core Strategies.

3.39 The second consideration was the response to the wording of the NPPF. It is a core planning principle of the NPPF that planning should "conserve heritage assets in a manner appropriate to their significance" (paragraphs 17 and 126), recognising that they are an irreplaceable resource and so that they can be enjoyed for their contribution to the quality of life of this and future generations. In this and numerous other statements the NPPF gives greater weight than previously to the appropriate treatment of heritage assets which do not have a national designation of some kind. Many authorities pointed out that they had made specific reference to 'heritage assets' in their own Core Strategies, and couched policies using that terminology. For the most part this was a matter of aligning existing local policy with national expectations rather than genuinely changing policy. Another issue arising from the wording of the NPPF had caused difficulties. An issue which repeatedly came up at planning appeals was the meaning of 'substantial harm' to listed buildings (NPPF paragraphs 132-133) – which should only be allowed exceptionally – and therefore the boundary between unacceptable 'substantial' harm and acceptable 'less than substantial' harm. This was unresolved. In contrast to this, another Conservation Officer reported that an effect of the NPPF had been that appeal decisions from the Planning Inspectorate had been much more consistent and supportive of heritage, including on such matters as changes to listed buildings, the importance of unlisted buildings in conservation areas, and the impact of double glazing.

3.40 One substantive effect of the NPPF is that this wording on 'heritage assets' has been widely interpreted to mean that local authorities should amongst other steps prepare a

'local list' of buildings which are not on the statutory list but are still locally significant. This would enable them more easily to fulfil paragraph 129 of the NPPF that "Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise." This was not investigated in detail, though authorities for the selected towns were clearly familiar with it. Those commenting had generally made little progress in the preparation of local lists. Local listing has been undertaken in Newbury and Berkhamsted (both still under review), while in Hastings the initial preparation of a list has been devolved to an enthusiastic local voluntary organisation.

3.41 The third aspect of the NPPF investigated was the local response to the way it prioritised growth in relation to heritage. The NPPF is clearly positive in its approach to both issues, so the local interpretation has an element of choice. Most authorities reported no real local change to the priorities relative to each other. However, in both Wymondham and Thornbury greater priority had been given to growth at the expense of heritage. In Wymondham it was reported that this growth agenda had been reflected in Conservation Officer advice being overridden more often in planning officers' recommendations to councillors.

3.42 The most significant consequence of the NPPF was identified at Thornbury. Here the greater emphasis on growth due to the NPPF had resulted in a major site being released at the expense of heritage to secure urban development for wider benefits. The spatial approach in the Core Strategy that allocated strategic housing to Thornbury identified the need to sustain and enhance its facilities and services in the face of competition from other retail outlets, the need to retain the town's schools and the role of the historic town centre. Thornbury Town Council too very much promoted the requirement for additional housing growth in Thornbury: the town was potentially suffering from economic and social decline and that if not addressed, as a result of the town's age and demographic profile, it would struggle to maintain key services and facilities. This point was grasped by the Core Strategy Inspector in making the overall planning balance. During the preparation of the Core Strategy a major application was submitted at Park Farm (to the north of Thornbury and now one of the sites in the town identified in the Core Strategy for growth). Subsequently, amendments to the Core Strategy provided a comprehensive explanation of why the Park Farm site was chosen in preference to others around the town. Amendments also strengthened the approach to the historic environment. Finally, a policy in the Core Strategy states that the housing capacity of the area north of Thornbury and near the Castle School will be confirmed through the completion of an Historical Environment Character Assessment which will also inform the layout and scale of development to help mitigate any possible impact on heritage values and assets. This was submitted as part of the masterplanning/application process. English Heritage accepted the mitigation measures proposed. In this way the NPPF had a direct effect on the Core Strategy, with promotion of growth being accompanied by tighter requirements to ensure that implementation respected heritage interests as far as practicable.

3.43 We conclude that the findings in the selected towns suggest that the impact of the NPPF on heritage and growth has been very modest in most local authorities, even when

Core Strategies were updated to meet NPPF requirements. Practical responses such as the preparation of local lists of heritage assets have been limited and often delayed. The biggest effects have been on the local rebalancing between growth and heritage: although this is often negligible, the Thornbury experience shows that the NPPF can facilitate a more growth-based agenda through both Core Strategy preparation and development management in individual cases.

Variation in local authority commitment to towns' heritage character and setting

3.44 The climate of opinion towards heritage in a local authority is enormously important in shaping outcomes in practice, as examples given above have demonstrated. The attitude to heritage is usually led by elected councillors as a cultural issue across a council, while recognising that individuals can take views that depart in various ways from the collective position. It can also be strongly influenced by dominant individuals (including senior planning officers) or by a history of significant past events. Some of its impact is direct, such as planning decisions to allow or refuse developments, the degree of compromise of heritage interests which authorities are prepared to allow, or the talking-up of heritage for regeneration or tourism purposes. Other effects are indirect, such as the policies which can be adopted in development plans, the level of staffing devoted to heritage, whether conservation officers are actively engaged in planning for major development sites, and the expectations for heritage which are generated in a town.

3.45 The study wanted an identifiable and comparative measure of councillors' views. This cannot be a wholly reliable exercise, but one strong indication of councillors' priorities is given in the Corporate Plan or equivalent document issued by almost every council on an annual or periodic basis. Typically a short statement of political priorities (with a commitment to everywhere being 'vibrant'!), these can be revealing by what they do and do not say. These documents were analysed in authorities covering each selected town and checked for the appearance of key words, such as 'heritage', 'historic', 'townscape', 'character' and 'setting'. The results are in Table 7. This shows that five of the eighteen authorities' corporate documents did not mention heritage issues at all. Ten more did so only very briefly or in a generalised way, and sometimes qualified their commitment. Just three gave the built heritage a significant place in their forward thinking (Winchester, Suffolk Coastal (for Woodbridge) and South Gloucestershire (for Thornbury)). All authorities emphasised economic issues as a priority, sometimes with remarkable levels of ambition.

3.46 The documentary evidence obtained and the interview results for this study gave strong hints about the climate of opinion towards heritage in each town. Paragraph 3.18 above noted briefly some of the range of attitudes which local authority councillors are perceived to have towards heritage. Taken together with the results from the review of Corporate Strategies, we conclude that the main findings are that attitudes to heritage vary widely between towns and that a commitment to the economic wellbeing of each town lies distinctly above heritage in the order of corporate priorities.

Table 7 Local authority engagement with heritage as expressed in Corporate Plans

Town	Document	No mention	Mentioned briefly	Significant issue
Berkhamsted	Corporate Plan 2012-15		Mentioned only at Old Hemel Hempstead*	
Chelmsford	Corporate Plan 2012		Awareness of sense of place but separate from prioritised growth agenda	
Chesterfield	Corporate Plan 2010-2014		Heritage assets to be better protected and enhanced	
Folkestone	Corporate Strategy 2013-18	Yes		
Hastings	Corporate Plan 2014/15-2016/17		Aims to preserve the 'best of' our heritage alongside development	
Henley-on-Thames	Corporate Strategy 2012-16	Yes		
Thame				
Ilkeston	Corporate Plan 2012-2016		Promotes development while protecting historic and built environment	
Leek	Corporate Plan 2011-2015	Yes		
Newbury	Council Strategy		Heritage and built environment mentioned	
Selby	Corporate Plan 2011-2015	Yes		
Stowmarket	Strategic Priorities 2013-14		Only mentioned when "balanced with growth"	
Taunton	Corporate Business Plan 2013-2016		Objective to deliver unprecedented levels of growth 'whilst respecting character and setting of the Borough'; heritage just noted as a 'strength'	
Wellington				
Thornbury	Sustainable Community Strategy 2008			Significance of the built environment noted + how much residents value it
Whitehaven	Corporate Plan 2013-2015		Heritage mentioned but no actions included	
Wigan	Corporate Strategy 2014-17	Yes		
Winchester	Winchester – Towards our Future, 2007**			Protection of environ-ment key to economic prosperity, but evolve city to maintain this
Woodbridge	Corporate Plan 2005-15			Discernible priority given to heritage of built environment
Wymondham	Business Plan 2011/14		Heritage element in revitalising market towns, but not heritage-led	

* This is where Dacorum BC is spending its money; hence Berkhamsted is not mentioned.

** There is no formal Corporate Strategy. This document was prepared by Winchester Town Forum (ward councillors) and endorsed by the Council

Conclusions

3.47 The weight given to the need to safeguard the character and setting of smaller cathedral cities and prominent historic towns in the plan-making process varies greatly between towns. Heritage plays a highly significant role in shaping development in some towns but in others is set to one side. The economic wellbeing of towns is councillors' primary concern everywhere, though this is interpreted differently from place to place. Heritage may either be viewed as fostering a town's distinctiveness, attracting visitors and raising the quality of life (e.g. Winchester and Woodbridge), or be viewed as a cost burden (e.g. Taunton and Wigan). The observed differences are primarily a function of the prevailing local authority cultural attitudes affecting each town. Broadly speaking, the process reinforces itself, with numbers of conservation staff, evidence commissioned, policies adopted and practical decisions taken all reflecting the relative priority given to heritage by councils.

3.48 This pattern has not been greatly affected by the preparation of Core Strategies or other Development Plan Documents under the post-2004 forward planning legislation, or by the issuing of the Government's National Planning Policy Framework in March 2012. In the large majority of cases heritage policy is marked by continuity from the former system of Local Plans to the current system of Core Strategies. This has been reinforced by the substantial delays in the transition, due largely to suitable new development management policies not being in place, with Saved Policies from the former system therefore remaining in place. There is some evidence that the relationship between heritage policy and growth policy has changed slightly in favour of growth, following the NPPF particularly, with a specific major example in Thornbury. However, it is not clear that this is significantly different from what might have happened had the former system of regional planning been maintained, which itself would have put pressure on local authorities to provide for additional development. In view of the broad continuity of policy, the findings here may be taken as reasonably indicative of the degree to which existing planning policies can be expected to safeguard historic settlements in future.

3.49 Heritage considerations are having some impact on the scale of development promoted through plan-making at historic towns, but this is secondary to the determination of central and local government to provide the necessary homes, jobs and facilities for a rising number of households. Many of the historic towns studied are affected by proposals not just for organic growth and urban renewal but for major greenfield urban extensions and, in cases like Berkhamsted, continued increases in urban density as the price paid for maintaining the town boundary in its setting (which is also designated as Green Belt in that case). Even important historic towns like Wymondham are affected by major growth, often selected for their location, role in the urban hierarchy or availability of land, irrespective of their heritage status. In these towns efforts are usually being made to accommodate growth and change with as little damage as possible to the historic core and the setting of the town. The Sustainability Appraisal of emerging plans is in varying degrees identifying the strengths and weaknesses of policies affecting historic towns, but often much more could be achieved. The main requirement is probably to capitalise on information gathering with more robust conclusions and recommendations.

3.50 New post-NPPF Core Strategies have been supported by additional evidence bases on heritage. Although beneficial in principle, the actual policies adopted are often so vague as to be of limited use by themselves. Area Action Plans for Town Centres in Chelmsford, Stowmarket, Wymondham (emerging) and to a lesser degree Taunton have been useful vehicles for providing much-needed detailed policy to get to grips with the local tensions between heritage and urban growth. The biggest problem of this kind is in those authorities which had weak heritage policies in their former Local Plans in the first place and for whom new and effective development management policies for heritage may remain some years away, notably Hastings.

3.51 There is some relationship between the quality of evidence and the quality of policy, e.g. both are relatively poor in Hastings and Ilkeston, and both are relatively good in Winchester, Wymondham, Woodbridge and Berkhamsted. A relationship between heritage policy and outcomes for heritage similarly exists to some extent, but this is less reliable. On the one hand heritage policies can be aspirational to some degree and not put into effect with great enthusiasm, as seems to us to be the case in Stowmarket. On the other hand, councils with weaker policies can be spurred to take heritage more seriously as pressure from new local voluntary organisations in Hastings and Folkestone demonstrates (and similarly to live up to their policies, such as in Chelmsford).

3.52 Council attitudes to heritage are of central importance in explaining heritage outcomes. The evidence from the selected towns is that this is not always a direct function of local wealth. Chelmsford is a wealthy town with a poor history of treatment of its heritage (but now making amends). Whitehaven is a relatively poor town but aiming for heritage-led regeneration. Folkestone's economy was badly damaged by the loss of cross-channel ferry services but is aiming for culture-led regeneration in which heritage is playing an increasing (if modest) part. If heritage appreciation can be built into councils' value systems, then the package of good planning policies, the staff to support them and the decisions to implement them should follow more reliably.

3.53 Conservation Officers, lobby groups, English Heritage and others have worked hard to secure heritage-friendly policies in development plans, and some notable achievements have been identified in the selected towns. This is an essential part of the process of giving proper weight to the value of historic towns and their settings, but it is important that this is not viewed either as an end in itself or as the only action which needs to be taken to achieve the heritage outcomes desired of the forward planning system.

CHAPTER 4

METHODOLOGIES FOR RECONCILING GROWTH WITH HISTORIC SETTLEMENTS

Introduction

4.1 Two of the project's objectives are:

> 'To consider how the special character of smaller cathedral cities and historic towns in their settings can best be conserved while provision is made to accommodate the future development needs of these settlements. This might involve consideration of local plan processes, methodologies, design approaches, use of existing or modified forms of protection, and other approaches/ideas'; and
>
> 'To look at measures local authorities can take to ensure that they give proper weight to the protection of the significance of their cathedral cities and historic towns. To consider the effectiveness of Green Belt designation and see if there are other established designations that can be used to identify the value of undeveloped land around settlements.'

4.2 Both these objectives require an assessment of tools available in the planning system to protect the heritage interest of historic settlements (character, setting, significance), and it is convenient to consider them together. There is a continuum of devices available from fundamentally heritage-based ones (which need some adjustment to make them usable through the planning system) to planning tools which can serve heritage alongside other purposes. Some tools are inherently more accommodating of development than others. No one tool need be exclusive of all others: many of them can often be used at the same time, and in numerous towns and cities it is their combined influence which has the overall effect.

4.3 This review of planning tools is limited to those which can apply at the scale of the whole settlement or a substantial part of it. Within a town there will be listed buildings, scheduled ancient monuments and even large parks and gardens whose protection is expected and whose settings are important locally. However, accommodating these interests does not normally dictate the overall scale and distribution of urban development. This study therefore does not concern itself with the protection of the individual heritage asset. In reviewing impacts on individual settlements, an effort has also been made to avoid undue overlap with other overridingly important constraints on urban development patterns, such as nationally important landscape and wildlife designations which constrain development. Where this has not been entirely possible, the interaction between these constraints and heritage constraints has often been instructive nonetheless.

4.4 This chapter provides a brief review of the methodologies available at the settlement scale to help reconcile heritage with urban development. In each case it outlines:

- the principles behind the methodology;
- how the methodology functions;
- documents which review the methodology;

– the case study city where the methodology is examined in this report; and
– other locations where the methodology has been applied.

4.5 Chapter 5 addresses the same objectives of the study through a consideration of experience in eight cities around England. That chapter summarises the implementation of the nine chosen primary methodologies in those cities, with one each in Bath, Chester, Durham, Lichfield, Oxford, Salisbury and Winchester, and two in Cambridge.

Historic characterisation, including historic landscape characterisation

4.6 Historic landscape characterisation (HLC) belongs to a group of characterisation methods used to provide understanding of the historic environment. It operates at the scale of the whole landscape, and therefore wider than sites or settlements, to provide a base map for a better appreciation of the historical evolution of places and their surroundings. It provides strategic information for others to use, such as for land management purposes, guiding development and landscape change, and integrating with other aspects of landscape evolution such as nature conservation, the visual landscape and green infrastructure.

4.7 Characterisation is map-based and aims to identify landscape types as they appear today. These are based on historic processes, land use and appearance. Landscape types are built up from information at the local level on a scale appropriate to the locality. This could be from the scale of a few fields (or distinct areas with other boundaries) and their associated buildings to substantially larger uniform areas. Characterisation typically derives mainly from desk-based media such as historic maps, air photos and other land-based survey data such as habitat surveys and ancient woodland inventories. Results are presented digitally using a Geographical Information System base. The evolution of the methodology is described in Aldred, A. and Fairclough, G, 2003, *Historic Landscape Characterisation: taking stock of the method*, English Heritage and Somerset County Council, and an outline of the concept is in Fairclough, G., 2005, *Boundless horizons: Historic Landscape Characterisation*, English Heritage.

4.8 Characterisation as an information provision process is usually followed by a second step offering a strategy for the conservation and management of each landscape type. This can identify the sensitivities of the landscape types to change, and therefore the opportunities for improving the distinctiveness of landscapes, the risks which change could pose, and the means of implementing change in ways which most suitably reflect an area's historic evolution. Initially a rural exercise, the technique has been extended into urban areas where townscapes can be identified. At the town scale the HLC method merges into historic area assessment (see www.english-heritage.org.uk/historicareaassessment), where the purposes of analysis tend to be development-related.

4.9 Of all the methodologies studied, historic landscape characterisation is the most fundamentally heritage-based. The insight it gives into the strategic historic background to an area must be adapted for planning purposes. Historic landscape characterisation can be used both in the preparation of development plans and to advise on the determination of planning applications. A handbook on *Using Historic Landscape Characterisation* (Clark, J,

Darlington, J and Fairclough G, 2004, English Heritage and Lancashire County Council) has a chapter devoted to spatial planning which shows how the methodology can be used, with many examples. It advises that HLC is used to gauge the likely impact that development will have upon the landscape, by assessing whether proposals are in keeping with the historic character of the area and whether they have an impact on any of the key cultural attributes. The method can also contribute to Environmental Impact Assessments and help identify the archaeological potential in gaps in Sites and Monuments Records.

4.10 A range of examples illustrate how HLC can be used in historic towns. The first HLC study was carried out in Cornwall in 1994. Here the methodology has since been expanded, notably through *The Cornwall and Scilly Urban Survey*, 2005 which took the process through characterisation studies of nineteen towns. The report of the work said of characterisation:

> "*Characterising the historic environment of each settlement will produce a valuable dataset on the historic fabric, archaeological potential and townscape character of the historic town. This information can certainly be used as a conventional conservation and planning tool to define constraints, as a yardstick against which to measure new development and policy proposals and as the basis of well-founded conservation management, restoration and enhancement schemes and policies.*
>
> *More importantly, however, characterisation also reveals the essential dynamic factors underpinning each settlement's character. Regeneration planning which is informed and inspired by these elements can take a much more sure-footed and proactive approach to creating beneficial change, both reinforcing and enhancing existing character and ensuring that new developments are better integrated into the existing urban framework, more focused and ultimately more successful.*"

4.11 Other examples of using HLC for planning purposes include the *Aylesbury Environs Study* (Green and Kidd, 2005, Buckinghamshire County Council Archaeological Service). Aylesbury has been identified as a suitable location for major long term growth and development to 2021 and beyond. At a broad level the study examined suitable locations for major development around the town assessing the impact that expansion would have upon the environment. Character areas were identified and combined with information from the Sites and Monuments Record and other environmental designations. The number and quality of each heritage component were assessed in each area and given a rating relating to their sensitivity and capacity to accommodate development without significant change or loss of historic character. These ratings were Negative, Neutral or Positive. Sensitivity to change is derived by cross-indexing the scale of impact with the importance of the asset affected.

4.12 English Heritage has developed a more detailed characterisation technique through the Extensive Urban Surveys (EUS) programme launched in 1992. This is part of a national programme of surveys of the archaeology, topography and historic buildings of England's historic towns and cities, supported by English Heritage and carried out by local authorities on a county-by-county basis. The original purpose of the programme was to help local authorities in England to implement Planning Policy Guidance Note 16 on Archaeology and Planning. Now, projects include characterisation of the historic environment as a whole and contribute to wider aims, such as the planning of regeneration and conservation initiatives.

Details of EUS coverage are available through the Archaeology Data Service website at http://archaeologydataservice.ac.uk/archive. English Heritage is currently promoting a national programme which includes amongst its aims influencing local planning policy and encouraging the integration of urban historic characterisation into the wider process of managing the urban environment. *From Markets to Metroland – The Buckinghamshire and Milton Keynes Historic Towns Project* describes its approach as going beyond heritage designations such as listed buildings and conservation areas to a comprehensive analysis of the urban environment in its entirety including above and below ground archaeology. The project uses a wealth of information to generate 'Historic Urban Character Zones' where the significance of its heritage is assessed. Significance is addressed via English Heritage's Conservation Principles which review the four heritage values (evidential, historical, aesthetic and communal) and mapped for each character zone showing heritage values as High, Medium/High, Medium, Low/Medium and Low. The project will be used as part of the evidence base for local plans, to inform positive strategies for the conservation and enhancement of towns, in the review of conservation area appraisals, the production of neighbourhood plans, informing development management decisions, management of the archaeological resource, and as a cultural resource for learning and enjoyment.

4.13 Historic landscape assessment is a methodology applicable to planning which provides evidence of the impacts of proposed developments on the historic landscape. This is carried out without the benefit of a full characterisation, but similarly examines the time-depth of the landscape to identify heritage which matters at the landscape scale (and also at the asset scale). It can typically incorporate the settings of assets and settlements and important views in or out of settlements that might be changed by development. Important in this assessment is the identification of development effects, so that planning authorities are informed of the degree of risk in proceeding with particular developments, scored against issues such as archaeology, designed landscapes and settlement settings. There are various examples available of the application of this methodology, such as *Historic Landscape Assessment for the Wiltshire Core Strategy* (Land Use Consultants, 2012, Wiltshire County Council).

4.14 A good practice example of the application of both historic landscape and historic area characterisation (the latter via Extensive Urban Survey) was reviewed as a case study in the city of Lichfield, where it was used to select areas for development around Lichfield and to structure individual schemes (Appendix 7). More information about this can be obtained from Lichfield District Council and a summary of its role has recently been published by English Heritage (Boffin, D and Roberts, D, 2014, *Conservation and design in land allocation*, Conservation Bulletin Issue 72, pps. 40-41). Within the case study cities, historic landscape characterisation has also informed the planning process in Winchester and historic landscape assessments have been carried out for recent development plan purposes in Salisbury and Durham.

Skylines

4.15 Many historic towns and cities have at least one tall building, typically a church or castle, that is often of outstanding importance to the identity of the settlement. Tall buildings which project above the rest of the buildings of the settlement are often

appreciated both from nearby, where they aid navigation around the town and act as a reminder of a principal feature, and from afar, where they help establish the identity of the whole settlement and the silhouette offers a reassuring grandeur. A desire to protect the qualities which existing tall heritage buildings offer to historic settlements has inspired methodologies to maintain the principal viewing opportunities.

4.16 The common feature to them all is a constraint on new developments in certain locations which would block out the viewing opportunities, either by directly impeding a vista or by marring the backdrop. This is in effect a constraint on inappropriate taller new buildings. Some local authorities have adopted planning policies which set out the objectives and empower themselves to restrict development on a case by case basis. Others have adopted policies which offer progressively more detail on matters such as:

– the taller buildings to which the policy will apply;
– the height of buildings which will be allowed (e.g. in particular zones, by reference to height above ground or above Ordnance Datum, or with reference to exceptions);
– the viewing positions or broad areas to benefit from the policy;
– the viewing channels to be kept open;
– the views out from the settlement to be protected.

Some of these policies may well be suitable for use in tandem rather than just alone. There is a review of selected modern practice in section 3 of *Review of the Salisbury Central Area '40ft rule' policy* (Chris Blandford Associates, 2008, for Salisbury District Council). English Heritage has also published a report *Seeing the History in the View: A method for assessing heritage significance within views* (Land Use Consultants, 2011). This has a slightly wider remit than skylines, but is still highly relevant for addressing the opportunities and difficulties which planning authorities face when wishing to protect important views from inappropriate intrusion.

4.17 View cones are a planning tool for identifying clearly on a map the splay of a view from a specific viewpoint which the planning authority wishes to maintain (or ideally improve). The objective is to avoid intrusions vertically into the view at least to the extent that the subject of the view – typically the town's historic core seen from some distance – is not impeded. The width of the splay will reflect the current opportunities (perhaps with sides constrained by existing structures or by woodland) and the benefit it offers (so that intrusions are restricted only into part of a panorama). A narrow view cone is in effect a viewing corridor, typically from a vantage point to a particularly valued tall structure. Substantial structures which frame such views may even be considered beneficial rather than intrusive. A view cone policy will necessarily be accompanied by a policy restricting in principle the height of structures which will be allowable within it.

4.18 View cone policies have been adopted at least in Bristol and Oxford. The Cambridge Local Plan of 1996 had a view cones policy, though this was dropped in the next review of the Plan adopted in 2006. The view cones policy in Oxford is examined as a good practice example in Appendix 8. The City Council's policy in Oxford is currently (mid-2014) under review with the assistance of English Heritage, the Oxford Preservation Trust and the wider public through consultation.

4.19 There can be more broad-brush efforts by planning authorities to preserve the visual setting of historic settlements, particularly where the scope for viewing a town or city is not limited to specific sites but widely spread. For example, from amongst the towns studied in chapter 3 there are prominent cases such as the protection of:

– the setting of Wymondham and its Abbey from intrusion through a large arc to the west of the town;
– views to the twisted spire of Chesterfield church in the town's hilltop location viewed from the surrounding countryside;
– the valley setting of Berkhamstead in the Hertfordshire countryside;
– the setting of Taunton – particularly its church towers – seen from the surrounding hills.

In some cases substantial areas of land may need to be kept free of development to protect the setting of a town or a key building within it. This can shape the direction in which a whole town may or may not suitably grow.

4.20 A case study of good practice in protecting a setting at an urban scale is Salisbury, Appendix 9. Here the setting of the city with the country's tallest cathedral is currently defended through the planning system by a policy which marks on a map a large area around the city in which inappropriate development will not be allowed in the setting. This is accompanied by a separate policy limiting development in the city centre to 40ft in height, which not only reinforces the character of the city's 13th century irregular grid layout but also serves to emphasise the great height of the cathedral and protect its immediate setting.

4.21 Cambridge is another case study city with planning policy to control building heights, in that case in both in the historic core and the rest of the city. The setting of other case study cities has been crucial to their identities and therefore protected by policies to control development. In Bath, the idea of setting is vital to the containment of the World Heritage Site, where development would otherwise spill out into the surrounding countryside. Here a Supplementary Planning Document has been prepared specifically on *City of Bath World Heritage Site Setting* (Bath & North East Somerset Council, 2013). Similarly, the containment of Winchester within the green hillsides rising up in most directions around it is vital to the town's identity and has therefore been a key feature of city planning for decades. Salisbury, Bath and Winchester lie within bowls surrounded by hills and offer a highly visual experience where there are views both in and out for everyone to enjoy. English Heritage has published guidance on *The Setting of Heritage Assets* (2011). This is primarily devoted to small scale heritage assets, but acknowledges the principle of settings at the urban scale, and the importance too of townscapes as the setting for individual buildings and the context shaping new urban design.

Urban intensification

4.22 The preferred location in planning terms for urban development in most towns and cities, historic or otherwise, is land within the urban area which has fallen into little or no use, known as 'previously developed land' or simply 'brownfield sites'. Urban land is continually available for recycling as existing uses cease and new ones materialise, and this is particularly pronounced in older urban areas which tend to have a much more mixed pattern of land uses than large urban areas built in a single campaign. Finding urban land to redevelop is therefore not a matter for a one-off search but a continually arising aspect of

the evolution of an urban area. The difficulty faced by many towns is that the rate at which brownfield land becomes available may be less than the rate at which new development is needed to house and sustain the nation. In economically buoyant areas the market will usually provide sufficient pressure for urban land not to remain vacant or underused for long. However, in historic towns the quality of the townscape and local character often ride on the outcome of the land recycling process, and great attention needs to be paid to the scale, massing, height, materials, design and treatment of the public realm associated with the new development.

4.23 Urban land recycling often provides the opportunity through good design to secure more development on a plot than did the structures that preceded it. More intensive use is made of the space available. In principle this can be sound: towns and cities need to adjust themselves for the present generation, and development can bring in new ideas, new people and new investment to support the heritage. Equally the risks are obvious too. When should intensification stop, because it is changing the physical character of a place into something it did not wish to become? How far can good building design and urban layout postpone the risk of character change? When does the volume of activity and intensity of use of the historic core of a town become a threat to its character rather than a benefit? Who decides, and how, that a town is for the most part full?

4.24 These challenging questions are not new, and methodologies have been developed to grapple with them. The principal tool has been the urban capacity study. This was extensively used in urban areas around the country to assess housing capacity after the Government publication *Tapping the potential – Assessing urban housing capacity: Towards better practice* in 2000. This had no particular reference to historic towns but did encourage local planning authorities to maximise the capacity of their urban areas to accommodate housing and suggested where to look for the opportunities. How far the process could be taken without causing problems remained unclear. More recent and valuable work focussing on the impact of housing on heritage interests has been published by English Heritage (Land Use Consultants, 2014, *Evaluating the impact of housing development on the historic environment*).

4.25 The concept of urban capacity for housing has been extended to the more comprehensive interest of environmental capacity. The study *Environmental Capacity in the East Midlands* (Hallam Environmental Consultants, 2008, East Midlands Regional Assembly) concluded that definitive answers cannot be given on how much development can be accommodated in an area without causing an unacceptable decline in environmental quality. This is due to a lack of detailed environmental data and lack of scientific tools for analysing potential change resulting from development. The heritage element of environmental capacity has received some attention, notably in *Environmental Limits for the South East* (Levett-Therivel, 2010, South East England Partnership Board). This pointed out that capacity can only be assessed if the current condition and sensitivity to change of the historic environment as a whole is better understood. It questioned the idea of environmental limits to change in the heritage sector, preferring the flexibility of 'capacity' and the adoption of a precautionary approach to any change which brings risks to the heritage. Even so, there are significant uncertainties in identifying capacity, made more problematic by the pace and scale of change that so many towns and cities face. The report

provides (in Appendix I) a useful commentary on the dilemmas, while inevitably struggling to provide solutions.

4.26 The capacity study approach has been applied with adjustments to historic towns. In particular urban heritage was a key issue facing the *Ely Environmental Capacity Study* (LDA Design, 2001, East Cambridgeshire DC). The Ely study considered historical development, visual character and distinctiveness and made no real distinction between townscape and landscape as the latter 'infiltrates into the city' with one borrowing character from the other. Extensive planning designations protect Ely's historic character, while the landscape setting is also covered by a variety of designations, mainly relating to nature conservation. Key variations in townscape character arise from historical development, variations in landform and the alignment of principal roads. The study also identified 'Quintessential views' which are regarded as distinctive, dominant and arresting, and refered to approach routes and departure sequences because "they impact on one's appreciation of the distinctiveness of the place". The analysis of all combined factors demonstrated that a substantial area of landscape performed a significant role in creating the setting of the city. It also pointed out that whilst distinctiveness could be undermined by inappropriate planning and design, the distinctive qualities of the city and its setting could be enhanced by careful attention to landscape planning which could provide opportunities to enhance the capacity. The assessment identified four sites north of the city as areas having landscape capacity for future development subject to site development issues, and another to the west subject to detailed feasibility study.

4.27 The importance of good design in historic places has been advocated in *Power of Place: The future of the historic environment* (English Heritage, 2000) and in the *Building in Context Toolkit* (CABE and English Heritage, 2001 now updated via a new website - http://www.building-in-context.org/). Power of Place highlighted that people place a high value on the historic environment and see it in its totality, rather than as a series of individual sites and buildings. It recommended the promotion of good design that enhances its context to create a rich historic environment for the future. The toolkit was produced as part of a training programme to help raise standards of new development in historic areas and was part of a suite of initiatives and programmes that also led to the establishment of design review panels. These small multidisciplinary groups of leading professionals offer detailed design advice to provide an independent, expert assessment of significant architectural proposals.

4.28 For good practice case studies, the present analysis turned to two historic cities constrained by Green Belt designation preventing their outward sprawl and therefore with a strong interest in making the most of urban land recycling, but in ways sympathetic to their vitally important heritage. Cambridge was examined as a city with a strong commitment to urban intensification as part of its response to a major demand for urban growth (Appendix 4). Bath and Oxford are two other case study cities facing similar pressures and inclined to a similar response.

4.29 The other case study city chosen was Chester, to examine the extent to which high quality design can smooth the evolution of a heritage city facing substantial development pressures. Over the years Chester has placed considerable weight on the design quality of

new development as a means of absorbing new development in an acceptable manner into a city with a substantial mediaeval core and still surrounded by its city walls. Chester was also the city chosen to explore a methodology for assessing the environmental capacity of historic cities. The report prepared for the City and County Councils, English Heritage and the (then) Department of the Environment, *Chester – The future of an historic city* (Building Design Partnership, 1994) is discussed in the case study (Appendix 5). Winchester is another case study city which has aimed to use high quality design as part of its solution to sustaining the local economy without development spreading out into its surrounding area.

Urban extensions

4.30 The outward expansion of existing settlements has been the standard response to growth pressures over the centuries. Most cities can trace their expansion with new housing and industrial quarters added progressively and bequeathing the pattern of neighbourhoods from different periods remaining today. For many towns the pressures of development now suggest that a further urban extension is the obvious – perhaps only obvious – course to follow if the scale of demand is sufficiently high.

4.31 There are tensions in how best to achieve suitable urban extensions everywhere but especially in historic towns. To avoid them becoming 'just another housing estate' there is often enthusiasm to plan them with a range of facilities to give them separate identities. This can assist the historic core of towns too if it enables needs to be met without adding undue pressure to the limited services which can be supplied from the historic centre. Conversely, urban extensions treated that way risk becoming suburbs unconnected from the historic centre culturally as well as physically, so a settlement's sense of place is eroded. Concentrating commercial activity in a historic core can aid renewal and avoid the risk of the town's centre of gravity being lost.

4.32 Winchester is a city which has reluctantly embarked on an urban extension, but in doing so has deliberately emphasised tying the extension into the fabric of the existing city in order to retain the character and spirit of the place as a whole. The case study (Appendix 10) describes the process of acclimatising to major change in a city which has valued its compactness, the dominance of its historic core and its setting. Urban extensions also loom large in the development planning of other case study cities: Salisbury, Lichfield and especially Cambridge. There are various studies advising on how to develop urban extensions, and numerous masterplans to evaluate, but little appears to have been written on the qualities needed in extensions specific to important historic towns.

New settlements

4.33 Free-standing new settlements are not planned as remote housing estates (though that can be the fate of smaller planned villages) but to be as self-sufficient as practicable. They will be planned not just with their own shopping, healthcare and education infrastructure but with employment opportunities, greenspace, social facilities and much more so that they can become fully-fledged towns as soon as practicable. Rather than just a dormitory, the aim is to integrate new settlements into the wider settlement hierarchy.

4.34 So far as historic towns and cities are concerned, satellite new settlements offer the chance for a fresh urban start that minimises the pressure of development and numbers of people on the historic core. The intentions today are somewhat different from the programme of post-war new towns promoted around Britain in which population was decanted from cities to new settlements beyond the new Green Belts encircling those cities. A new settlement promoted today as part of the response to an historic city's burgeoning growth is likely to be located within ready travelling distance of the mother city, recognising that higher order services need to be available to the new settlement's residents. Building a free-standing new town to the point where it is large enough to provide most of its own services takes decades not years. In these circumstances, and necessary in the modern age, much more attention is paid to rapid high capacity transport facilities to give the new settlement access to the outside world: the cost of this can easily shape the locational choices available.

4.35 There is only one realistic good practice case study available of a new settlement relieving pressure on the historic core of a city, and that is Cambridge (Appendix 4). Even here the new settlement programme (there are currently four under construction or planned) is conceptualised as part of a growth strategy more than a means of protecting the historic core, though the consequences are the same. A number of other case study cities believe themselves to be full or nearly so, and in some cases have been able to divert some growth pressures elsewhere (Winchester, Bath, Chester), but none has actively promoted a new or greatly expanded existing settlement as part of the solution to its development needs. It is unsurprising in these circumstances that new settlements barely feature in reviews of how to relieve development pressure on historic towns and cities.

Urban containment

4.36 Urban sprawl has a bad image: 'could be anywhere' development spreading out of a town centre for miles, followed by breaks in the built-up area which become progressively wider and blur the distinction between town and country. A town concerned for its identity would surely insist on a more compact layout and control its urban edge, bringing people into the life of the town and making the centre as accessible as practicable. Historic towns and cities face not only these challenges but significant additional issues which make containment still more important to them:

- if the town were to expand greatly, the pressure of the extra people and traffic could overwhelm the historic core, leading to either unacceptable change to the historic fabric or a loss of function of the historic core as other areas fulfil that role instead;
- the setting of the town seen from the surrounding area could be eroded or lost, removing historic and culturally valuable viewing locations and diminishing the opportunities for people to appreciate their historic town;
- green infrastructure often links historic towns to their surroundings and is highly appreciated, but its extent can be directly or indirectly threatened by peripheral development;
- a town's character is affected by its scale: continual outward growth (which can include the absorption of neighbouring villages) can eventually transform a town into a city, so constraints on outward growth help to protect an historic town's identity.

4.37 The principal planning mechanism to achieve urban containment and prevent sprawl is Green Belt, a designation on a map having an inner boundary at or close to the urban edge and an outer boundary at some distance beyond, with very strict controls over the types of development allowable in the designated area. The National Planning Policy Framework reaffirms (paragraph 80) longstanding policy that Green Belt serves five purposes:

"• to check the unrestricted sprawl of large built-up areas;
• to prevent neighbouring towns merging into one another;
• to assist in safeguarding the countryside from encroachment;
• to preserve the setting and special character of historic towns; and
• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."

The fourth of those purposes was an important consideration in the designation of Green Belts around cities such as Bath, York, Chester, Oxford and Cambridge.

4.38 Green Belts have been one of the most successful planning policies and widely appreciated by the public if not by developers. Since the boundaries of most Green Belts were fixed, mostly in the 1970s and 1980s, the policy of allowing development within them only in 'very special circumstances' has largely been upheld: certainly there has been little expectation amongst developers that permission will be granted, and so challenges to the policy have been relatively few (apart from a period between 1984 and 1989). Green Belt boundaries have been relaxed from time to time, though, when development plans have been reviewed, typically to accommodate development needs that could not easily be met in other preferred ways (such as on brownfield sites and through urban land recycling).

4.39 Challenges to relax Green Belt boundaries have been made as much around historic cities as anywhere else, sometimes promoted by local authorities themselves. For example, an attempt by Chester City Council in 1988 to release over 1,000 acres of Green Belt land for unspecified housing and industrial development was eventually stopped by the Secretary of State in 1990, and proposals by Cheshire County Council through its Structure Plan to release over 800 acres from the Green Belt around Chester were again rejected by the Secretary of State, Michael Heseltine, in July 1991. In response to the Examination Panel's report, Mr Heseltine's statement said:

> "10.4 The Panel were not convinced that a proposed large scale release of Green Belt land was compatible with preserving the historic character of Chester… they considered the County Council had not shown beyond doubt that there was no other way of achieving the levels of development proposed, and that release of Green Belt land might put the historic character of the city at risk. The Panel considered that release of Green Belt land on the scale proposed would not be appropriate and recommend that a more thorough examination should be carried out of the likely consequences for the character of the City.
>
> 10.10 The Secretary of State considers the balance between growth and conservation, and the purposes of the Green Belt around Chester to be matters of national importance as well as local concern. He considers the Panel have carefully examined the relationship between the historic city and its Green Belt, traffic and land

provision. The Secretary of State accepts the Panel's advice that there is a need for caution whenever any strategic release of land in Chester is considered….".

4.40 Many historic towns and cities are not surrounded by Green Belt and therefore rely on other local planning policies to prevent inappropriate outward urban expansion. Chief among these from those examined in case studies is Winchester, which has still largely managed to hold its urban boundary. Without a designated Green Belt the task of urban containment is harder, but clearly not impossible.

4.41 Durham has been chosen as a case study of urban containment (Appendix 6). The Green Belt around Durham was established relatively recently, in principle in 1999 and in detail in 2004. This was to a large degree in support of the protection of the Durham Castle and Cathedral World Heritage Site and therefore strongly heritage-related. It has provided an opportunity to examine what a new Green Belt was expected to achieve and how it has performed, albeit that half the period since designation has been taken up by a recession that significantly constrained investment. Many other case study cities are also surrounded by Green Belt, and this has been a contributory issue in examining their efforts to reconcile growth with heritage (Bath, Cambridge, Chester, Lichfield and Oxford).

World Heritage Site

4.42 The World Heritage Convention 1972 provides for the identification of World Heritage Sites for their Outstanding Universal Value, under the auspices of UNESCO. This Convention has not been adopted into UK legislation, so the protection of World Heritage Sites (WHS) depends on Government policy. For land use planning purposes, this is set down in the National Planning Policy Framework, though there is no single paragraph devoted to them or explaining their significance. Rather there are expectations including: that 'substantial harm' to a WHS should be 'wholly exceptional' (132); that development within them should "enhance or better reveal their significance" (137); and that "loss of a building (or other element) which makes a positive contribution to the significance of the… World Heritage Site should be treated either as substantial harm… or less than substantial harm, as appropriate… [for which there are different policy responses], taking into account the relative significance of the element affected and its contribution to the significance of the… World Heritage Site as a whole" (138). In practice, World Heritage Sites are more actively supported by the Government and the expectations within local authorities responsible for them are high.

4.43 The City of Bath is the only entire historic settlement in the UK inscribed as a World Heritage Site. It is as an 18th century ensemble based on earlier Roman Baths that it gains its status. With the whole of the city affected and with protective actions expected, the operation of the planning system in the City is significantly affected. However, there are no specific planning powers in any WHS (unlike Conservation Areas or National Parks, for instance), so the existing available planning powers have to be applied to the cause of the WHS. Fortunately, Bath has a large Conservation Area and its entire periphery is designated as Green Belt and three quarters of it as Area of Outstanding Natural Beauty. The good practice case study of Bath (Appendix 3) shows how this arrangement has worked in practice. This has wider implications, first for other, smaller WHS in parts of cities (Durham

Castle and Cathedral, Canterbury and Maritime Greenwich) and secondly for the use of planning powers in equivalent ways even where a WHS has not been designated.

Conclusion

4.44 This chapter has not set out an exhaustive list of methodologies for tackling the tensions between heritage and urban growth at the whole settlement scale, but it has presented the main ones. Other existing planning tools such as Conservation Areas have a role to play, but arguably fall short of classification as a methodology (even when accompanied by a Conservation Area Appraisal). Landscape-based methodologies (such as Landscape Character Assessment) can contribute to settlement planning and therefore to heritage settlement planning, but for practical purposes historic landscape characterisation has been taken as the more appropriate starting point for current purposes. Finally, the new system of Neighbourhood Development Plans is emerging, and as its practice expands there may well be more examples to draw on of the scope for using this methodology at the small settlement level. Early indications particularly from Thame in South Oxfordshire suggest that growth and heritage can be integrated by this means.

CHAPTER 5

OVERVIEW OF THE EIGHT CASE STUDY CITIES

Introduction

5.1 The project set out to examine good practice examples of methodologies used to reconcile urban growth with heritage in historic towns and small cathedral cities. Examples of nine methodologies were chosen, applied in eight cities, as explained in chapter 4. The case studies of the cities of Bath, Cambridge, Chester, Durham, Lichfield, Oxford, Salisbury and Winchester are presented in alphabetical order in Appendices 3-10.

5.2 This chapter performs three functions:
– explaining the background to each case study and their principal findings;
– reviewing a series of heritage-related issues across all the case study cities; and
– identifying cross-cutting heritage-related issues which arose in selected cities.
The opportunity has been taken in the latter two functions to include relevant experience from the twenty historic towns studied for their experience with forward planning (see chapter 3).

5.3 Reconciling growth with the heritage of some of our finest cities is not an exact science. There are loose ends and blurred issues in all cities, so the case studies paint a snapshot of progress in 2014 as interpreted by the researchers. The constraints on the project inevitably limited both the depth of study and the scope for cross-referencing with others the views expressed by interviewees to the researchers, so misunderstandings may remain. A key feature of the project was face-to-face interviews and site visits in order to obtain the best possible insight into local realities. In each case study city the objective was successfully met to speak as a minimum to the lead Conservation Officer and the Planning Policy Manager in the local planning authority and to a leading representative of the local voluntary sector having familiarity with planning and heritage issues. The researchers are immensely grateful to them all for sparing considerable time and tackling difficult issues. This report respects the confidentialities of opinions fairly offered (a special matter for local government staff who have duties as employees as well as professionals) while benefiting from the thrust of the arguments put.

5.4 Superimposed on the evaluations have been the rapidly changing circumstances during the recent years in which activity was being assessed. The major economic downturn from about 2008 to 2013 after a prolonged period of growth had markedly different effects in the different cities. Wealthy cities such as Winchester noticed little real change in the level of development pressure, while at the other end of the spectrum even the otherwise thriving city of Durham, set in an extensive area of low land values, suffered significant temporary cooling in investment. With simultaneous changes in the forward planning system and national planning policy (described in chapter 3), there was a challenge to pick out the impact specifically of heritage objectives in the observed pattern of activity.

Case study summaries

5.5 The methodologies and the case study cities were selected in principle by the project Steering Group following discussion with the researchers. In some cases the choice was easy (such as new settlements around Cambridge and World Heritage Site in Bath), but in other cases there were numerous candidates to choose from (such as urban containment by Green Belt, which surrounds many cities). Issues which shaped the choice of cities for study included requirements for:

– sufficient local development pressure so that the reconciliation with heritage interests would be worthy of study;
– a reasonable geographical spread of cities around England so that any unintended economic or cultural biases could be avoided (or at least identified); and
– free-standing settlements rather than those embedded in conurbations where urban boundaries were close to or even merged with adjacent settlements, to avoid the risk of substantially complicating the analysis.

The methodologies studied and the choice of cities as good practice examples are explained briefly in chapter 4.

5.6 The following case study summaries outline the issues faced by each local planning authority and how these were tackled, and suggest the lessons and transferable advice which emerged from them.

<u>Bath</u>

5.7 The outward growth of Bath is probably more constrained by nationally important environmental designations than any other city. Like many it is surrounded entirely by Green Belt. It is also surrounded on all but its south-west side by the Cotswolds Area of Outstanding Natural Beauty. Above all it is inscribed as a World Heritage Site (WHS), where part of its attraction is as a city with an impressive setting within its surrounding hills. The urban boundary is often not only clear but readily apparent from within the city. The desire to maintain the green setting applies not only to avoiding outward sprawl so that the city's identity is not lost from inside, but also to maintaining the attraction of the sudden surprise which Bath offers when approached over the crest of the ridge from outside. There is a clear expectation that Bath will need to meet its urban development requirements within its boundaries so far as practicable. However, planning for development is challenging due to the WHS status across the whole city and the expansive area of the Georgian core where change is inevitably likely to be very limited.

5.8 In response to development pressures Bath and North East Somerset Council has been relatively fortunate in having sufficient previously used land now available for reuse that it can generally meet its housing and other requirements for the next few years. Other sites have also been found within the city to contribute to meeting needs without undermining WHS purposes. The results have been enshrined in a Core Strategy recently adopted by the local planning authority. Sufficient land is being made available so that Bath meets its share of the local authority's obligation to supply housing (see Table 8 below). The preparation of this Strategy was nevertheless a major task, not least because of disputes over modest land releases proposed on the city fringes. While urban land recycling will no

doubt continue, Bath faces the question whether this will in future be on a scale sufficient to meet the development requirements of a city this size. If not, the likelihood is that other parts of the Council area, whether beyond the Green Belt or even within it, may be asked to increase their contribution to Bath's needs. Adjacent authorities may also need to be asked, though of course the Green Belt and AONB extend into some of those areas too.

5.9 The World Heritage Site designation is a badge of excellence that has both commercial and heritage benefits, so maintaining the quality of Bath's environment is seen by most parties as a shared responsibility. This has real potential to be a reproducible outcome, even in the absence of WHS designation, in historic towns and cities where a high quality built heritage is appreciated by commercial interests to be a benefit rather than a cost. Allied to this has been the application of WHS standards to the whole city, not simply in the Georgian core. This has enabled the local authority to insist everywhere on high standards of design and materials (for example) rather than only in the Conservation Area. This is a virtuous circle, raising expectations of developers and therefore of what is proposed. It reinforces the message in the National Planning Policy Framework about the merit of good design, and is a benefit which historic towns and cities everywhere should try hard to emulate. It is important to appreciate that the achievements in the Bath WHS have been without any special extra planning powers as the designation confers none, so other authorities should not be put off from trying to do the same. The WHS Management Plan was prepared as a partnership effort and provided a mechanism for bringing viewpoints together to commit to practical improvements in Bath. This was not controversial but helped to build agreement about how to reconcile development with heritage, amongst other purposes. Other towns and cities could readily adopt the same approach in search of similar benefits, even if not underpinned by the formal requirements of an inscribed World Heritage Site.

Cambridge

5.10 Cambridge is a fast-growing city, yet it retains at its heart an outstanding historic core in a very liveable environment. Outward expansion is constrained by a tight-fitting Green Belt (though this was itself redrawn less than ten years ago to facilitate urban extensions), and there is a wide appreciation of the green feel to the city provided by green fingers from outside (primarily the River Cam), green spaces within Cambridge and ease of access to the surrounding countryside. Constraints on expansion have helped to protect the historic core from pressures of over-use, but sustained growth in recent years, and the likelihood of this continuing, have demanded a more proactive response through the planning system.

5.11 Urban extensions continue to be planned for, often spreading into the surrounding local authority of South Cambridgeshire DC which encircles the city. Research and commercial development are also being promoted on the city fringes, to some extent relieving pressure on the centre. The other response of the City Council to development pressure is to encourage urban land recycling. In effect this is urban intensification because replacement development is usually at higher density and of much higher value than what went before. The City Council has sought to manage the intensification process by taking a design-led approach: only physically sympathetic schemes will be permitted. Minimum

densities are not even mentioned. Control is exercised in part by restrictions on the height of development across the whole city, which protects both the historic core and the suburbs, but with allowances for taller buildings in appropriate locations. The effect of this response is that the taller structures allowed (usually housing-dominated mixed use developments) and the more urban large renewal schemes are gradually transforming Cambridge from a market town to a city in feeling, but with the historic core barely altered.

5.12 Meanwhile the growth pressures of the subregion based on Cambridge have prompted the solution of free-standing new settlements. South Cambridge has many villages but no large town. Some of those villages have recently been expanded, but this is now viewed as a much lower priority. Also, attempts to expand a ring of settlements further away from Cambridge in other local authorities have caused their own difficulties with transport capacity and road congestion. New settlements served by high capacity new transportation systems are now the preferred option. A new town to the north-west called Northstowe is now at the point of starting following a delay caused by the recession, with the guided busway to serve it already in place (extending from Cambridge to St Ives and Huntingdon). A large new village at Cambourne is nearly complete (though an expansion of it is now planned), and another is proposed adjacent to it at the former Bourn Airfield, both of them served by a new dual carriageway road running west from Cambridge. Another longer term planned new settlement is at Waterbeach on a former airfield to the north-east of Cambridge, where relocation of the existing railway station could serve both the existing village and the new town. The formal position is that these new settlements will meet the housing and development needs of South Cambridgeshire, but the effect of the close relationship with Cambridge is that subregional pressures are being removed from the historic city and met remotely.

5.13 A principal message from growing cities like Cambridge is to take a very positive attitude to development, expecting it to happen and making it good. High expectations for all aspects of design, clear policies and extensive pre-application discussions with developers help to achieve good development, but these must be supported by staff with the design skills to recognise and require the necessary standards, and therefore the process must be properly resourced. Heritage buildings and their surroundings should be planned-in to developments from the outset, not treated as a problem. A message from Cambridge is also that urban intensification will work best for heritage by aiming for the most appropriate scheme for a site, rather than by deliberately focusing on raising densities.

5.14 New settlements take a long time to plan and develop. Their success depends on a clear vision, clear principles, genuine partnership working and interventions to support the intended evolution of the settlement. A team of people based in the planning authority dedicated to the project is needed to make this happen, and they must insist on the standards set for the settlement being implemented. New settlements are therefore a longer term solution to a continuing growth requirement, not a short term fix to a gap in housing supply.

5.15 Cambridge also demonstrates the enormous importance of co-operation between local authorities where development issues cross administrative boundaries. The long period of shared vision and co-operation between Cambridge City and South

Cambridgeshire District Councils is an object lesson in subregional planning, the one recognising that its development needs cannot be met entirely within its boundary and the other keen to co-operate with the authority providing most of the employment and services for its residents. Political differences need not be a barrier to pragmatic solutions.

Chester

5.16 The historic core of Chester is really only appreciated 'upon arrival'. Yet the Green Belt designated around the city was clearly intended to fulfil one of a Green Belt's main purposes – namely to preserve the setting and special character of historic towns – and it appears to have been successful in this aim. In this context, the main issue for the planning system to address is preserving the historic character of the city which is strong and diverse and includes extensive Roman remains, the city walls, the unique medieval timber framed "Rows" and the elegant Georgian and Victorian streets set within the broad sweep of the River Dee. Chester plays a crucial role in the economic well-being of a wider region and maintaining its primacy as a commercial and retail centre is an important element of its Core Strategy. In order to achieve this, the city has to meet growth targets and this is proposed via a series of strategic allocations including a housing site that involves releasing land from the Green Belt within the ring road.

5.17 An important element of the local authority's approach to reconciling growth with heritage has been to promote high standards of design in new developments. In the city itself, urban intensification arising from redevelopment of brownfield sites could threaten its character but a number of well-designed schemes incorporating the conversion of historic buildings and a mix of traditional and contemporary architecture are creating a new townscape that, by and large, respects the city's historic character. This success is probably assisted in some measure by the generally prosperous nature of both the city and county.

5.18 A notable issue arising from the case study is the potentially 'transitory' nature of architectural styles and taste. Within the city centre there are some large mid-late 20th century redevelopment schemes notably the Grosvenor Centre and the area around the Market Hall as well as numerous examples of contemporary 'infill' developments on smaller sites. In terms of aesthetics and appearance several of these have always had a completely different character to the grain and scale of the old city yet at the time of their construction they were praised as fine examples of modern design well suited to their context. Now, a mere forty or so years later, their scale, materials and appearance are viewed in a very different light and the (not unrealistic) hope is that their proposed replacements will follow the lead set by more recent schemes that are genuinely innovative in their design whilst preserving and enhancing the city's character. In this respect, the various reports on conservation and design published over a long period of time for Chester are apparently bearing fruit. Unfortunately a strong note of caution needs to be included in that hugely experienced conservation staff have recently retired and it remains to be seen how the cuts in local authority budgets (and the reorganisations that are an inevitable corollary of them) will affect staff resources. In a city as important as Chester it is vital that suitably experienced staff are appointed to fill the void.

5.19 Two points raised in this case study are worthy of wider consideration. First, in a buoyant economic climate, planning authorities feel themselves able to take a much more robust approach in their negotiations with developers either in terms of the scale of proposals or the overall quality of design. When markets are depressed it is much harder to achieve this as there is a fear that if pushed too hard, developers will simply walk away from a scheme. It would be interesting to learn if this view is also held elsewhere and it is potentially a topic worthy of further consideration.

5.20 The second issue arises from Council's publication of a document entitled the *Chester One City Plan*. This refers to a "mosaic of opportunities, which when brought together should deliver so much more as a coherent whole than individual interventions will ever achieve independently.... It is the culmination of an appraisal of the current development proposals, project briefs and strategy documents that focus on individual aspects of the cities areas and policies. This document sets the overarching vision and direction of travel for the city, under which all projects must sit." By implication the city feels that its Core Strategy alone — for whatever reasons, is either incapable of addressing these matters or an inappropriate vehicle through which to do so. This should surely be addressed so that democratically-based forward planning policies can pursue the vision.

Durham

5.21 Durham is a compact city dominated by its World Heritage Site Cathedral and Castle on a peninsula overlooking the River Wear. An important part of the Outstanding Universal Value of the Site is its setting and the character of the city in which it sits. Durham is a particularly 'green' city which includes green fingers of land extending close to the city centre via a series of parks, meadows and playing fields, and this close relationship between open space and buildings is a notable feature of the city. Its character and setting are major determinants of the city's capacity to accommodate additional housing. However, Durham is an island of prosperity in the county, so there is pressure for growth in and around the City.

5.22 A key response to these development pressures was to establish a Green Belt around Durham in the 1999 Structure Plan partly to safeguard the special character of the city and its setting. Another strand of the Structure Plan was that a Green Belt would encourage development at some distance from the city and assist regeneration of former mining villages affected by the closure of the coalmining industry. The City of Durham Local Plan fixed the Green Belt boundaries in 2004.

5.23 Broadly speaking, this Green Belt policy has been successful notably in protecting Durham's heritage, in encouraging urban regeneration and in promoting development in the mining villages (which otherwise would have been most unlikely to happen, particularly with the reduced public sector funding that once enabled the provision of new employment facilities there).

5.24 However the political climate changed in 2009 with the establishment of a new unitary authority for the whole of the County of Durham which sees the city as the principal economic asset of the sub-region where development can assist the regeneration of the

whole county – which includes some of the most deprived areas in the country with extremely low house prices and land values. In order to achieve this, the new authority proposes to release 23 acres for employment and sufficient land for about 4,000 houses from the Green Belt around Durham. The Council has sought to remove the least sensitive land in relation to protection of the historic city, and during autumn 2014 an Inspector will address the options at the Examination of the submitted Local Plan.

5.25 The lessons from Durham are dependent on the outcome of the Examination. Most of the Durham Green Belt is proposed to remain in place, but the new policy approach places a reduced emphasis on the Green Belt as a means of protecting the City and the World Heritage Site. Nonetheless, the Supplementary Planning Documents prepared for each of the major sites set the parameters for development and include references to the heritage assets concerned – including the Cathedral and Castle. Durham's Green Belt is recent and may be treated by some parties as less permanent than other Green Belts (though there is no policy basis for that view).

5.26 The enlargement of the university at Durham brings concomitant pressures to accommodate increased numbers of students either in purpose built blocks – whose design needs careful resolution through close attention to urban design principles – or in student lettings which can affect the local housing market and have physical impacts on the traditional housing stock. These are clearly sensitive issues that raise concerns amongst the local population, though this issue is not unique to Durham and is one the council is seeking to address.

Lichfield

5.27 This small cathedral city in Staffordshire provides some interesting approaches to reconciling growth in a historic place. The city's skyline is defined by the cathedral's unique arrangement of three spires plus the spires of another two churches, and by and large its largely medieval street pattern is still discernible. The city is just 16 miles from Birmingham and faces considerable growth pressures. In the short term, the District Council is still to adopt its Local Plan and meanwhile does not a five year supply of land for housing. Developers have tried to seize this opportunity by submitting planning applications on land not proposed for allocation in the plan. Looking ahead, in order to accommodate its growth targets Lichfield is proposing to rely on some release of land from the Green Belt, although one of its strategic sites lies to the east of the city, beyond the West Coast mainline that forms the Green Belt boundary. The city lies in a shallow bowl and potentially the proposed housing sites could affect its setting.

5.28 Two principal methodologies are employed in Lichfield to minimise such impacts. Firstly site allocations have been guided by a county-wide Historic Landscape Characterisation which helps to identify the potential impact of development on the historic environment. Then at a more detailed scale Lichfield (along with all other historic market towns in Staffordshire) has been the subject of an Extensive Urban Survey which provides more information via a Historic Environment Characterisation of the city.

5.29 Secondly, the city has taken a proactive approach to urban design and negotiations with developers through a well-established and successful system of pre-application discussions and the preparation of jointly agreed development frameworks which set out the broad principles to be followed on individual sites. This has led to some high quality housing schemes on the fringes of the city where dwellings sit in well-landscaped sites with a public realm designed to create or maintain vistas that focus on the cathedral spires. This has proved beneficial and has resulted in some positive outcomes. Within the city too there are some notable new developments with award winning status, but almost inevitably some of this modern contemporary architecture has not found universal favour.

Oxford

5.30 Oxford, with its world famous dreaming spires, faces a complex set of interrelated issues. The city is under considerable pressure for growth from a range of sources. This includes the pressures on the transport system that arise from large scale commuting both by residents travelling out of the city to work in London and by employees travelling into the city to work, many of whom cannot afford to live there with house prices amongst the highest in the country (and hence the shortage of affordable housing is also an important issue). The world famous university wishes to expand its research facilities within the city and increasing numbers of students require accommodation within easy reach of the colleges.

5.31 At the same time, Oxford's administrative boundaries are closely drawn around the city itself. The open land that does exist is largely covered by Green Belt, much of which comprises flood plains (which also have ecological importance), all of which combine to constrain where housing can be accommodated. The city and its surroundings comprise a historic core lying on the plains of two rivers surrounded by a number of hills. Within the city, the height, spacing and architectural qualities of the spires and the skyline that they create are of particular significance and this has been recognised in the planning of the city for over 50 years.

5.32 Although the city's Core Strategy proposes some strategic allocation of land for housing and employment uses, the constraints are such that Oxford's growth targets can only be met if land outside the city's boundaries is released for development. It is therefore reliant on cooperation with neighbouring authorities but it is not clear that this is happening with sufficient vigour to resolve the development pressures in the Oxford subregion.

5.33 The principal methodology used in Oxford to protect the special qualities of the historic core and their enjoyment from the surrounding area is 'View Cones' to protect existing views of the city. Because of Oxford's topography, views of the city skyline are spread over a wide area, and the cones are essentially a series of viewpoints, beyond the city, from which its skyline can be seen. From these viewpoints, lines are drawn to the spires that can be seen from that point and within the resultant triangle (or cone) development must comply with certain requirements including height limits. This is a much simplified description of a highly sophisticated planning tool which employs numerous criteria in its application and consideration of whether or not development proposals are acceptable.

5.34 The methodology has changed over the years and a new view cones study (at the time of writing) is out for consultation. It seems that the concept does not have universal support and there appear to be opposing views. At different ends of a spectrum one opinion is that they are too simple and take a purely geographic approach from a restricted number of locations and at the other end, an opinion that they are over complicated and difficult to implement and understand.

5.35 In addition to the methodology, the case study highlighted the contrasts between the exquisite townscapes of the best parts of the city and the extremely poor buildings and public realm presented only a few minutes' walk away are harsh and stark. One fairly recent development was so harshly criticised that an independent review was commissioned to examine the City Council's handling of the case, and partly as a response to this a Design Review Panel has now been established in Oxford which should address shortcomings in the consideration of proposals.

Salisbury

5.36 The mediaeval planned town of Salisbury is dominated by its Cathedral, which has the tallest spire in England. The city is set in the valleys of five rivers with watermeadows to the south and surrounded by low hills. There are some outstanding views to the Cathedral both along the valleys and from the hills, and the spire is a landmark presence within the built-up area. The views therefore help define what is special about Salisbury. The variety of directions from which the Cathedral can be viewed poses a challenge to locating new development unobtrusively. Wiltshire Council, like Salisbury District Council which preceded it until 2009, is keen to bring investment to the city to reinvigorate the local economy, including new housing development to stimulate the labour market. Given the limitations of development capacity within the city, there was an extensive search during the preparation of the South Wiltshire Core Strategy for suitable peripheral areas to accommodate this development.

5.37 The local authority's policy background is clear. Since the 1960s Salisbury has operated a '40ft rule' through planning policy in the city centre, limiting the height of new buildings which would otherwise rise above the mediaeval town or challenge the majestic Cathedral. This has ensured that distant views to the Cathedral remain impressively unsullied by nearby urban development. The policy has been applied consistently and effectively, with considerable public support outweighing any suggestion that taller developments might be allowed. The greater challenge for urban growth has been to sustain the range of locations from which views to the centre can be enjoyed. Policy adopted in the South Wiltshire Core Strategy has emphatically protected the main viewing areas through a policy "to ensure there would be no detriment to the visual quality of the landscape" supported by an area marked on the Proposals Map showing where it applies. A landscape assessment and an Historic Environment Assessment helped to identify development areas which minimised impact on the setting of Salisbury. The emerging Wiltshire Core Strategy, which will supersede that for South Wiltshire, maintains the principle of protecting the setting, but through a policy which applies to all sensitive skylines in Wiltshire and without the aid of map showing where it will apply around Salisbury.

5.38 The experience in Salisbury with a tall buildings limitation suggests that Councils can successfully apply restrictive planning policies over prolonged periods of time for the benefit of heritage in historic towns. Evidence and policies need to be applied on a day-to-day basis to be effective and to be seen as essential by developers. Public support can be obtained and a culture of expectation can apply widely so that challenges to policy are minimal. This can be achievable provided sufficient land is still found for development. Any necessary assessment of possible sites for development should be commissioned as early as possible for the purposes of plan preparation. Landscape and historic environment assessments commissioned during the process of preparing a new Core Strategy for Salisbury were critically important to justify appropriate policies for reconciling growth with the setting of the city. If these had been carried out somewhat earlier there would have been less need for later revisions to a number of strategic urban development site allocations in the plan.

Winchester

5.39 Winchester is a compact city in the Itchen Valley in Hampshire with the chalk downs of the South Downs National Park rising immediately to the east. Other low hills surround the town offering fine views over the city noted for its tree cover. Approaches on all the radial routes which converge on Winchester's core bring visitors to sharply-defined urban edges. Residential suburbs focus around the radial roads without the feeling of urban sprawl, and between these are green wedges which draw the countryside into the city. Retailing and urban services have been retained within the city, and the urban edges generally kept free of lower value activities which often detract from other towns. The city's enormously valuable heritage has been extensively studied, including its place in the landscape and appreciations of what makes Winchester special. Winchester City Council has long pursued a policy of urban land recycling as a means of accommodating development, together with fitting in modest developments within the urban edge when opportunities arise. This has aimed to preserve the setting of the city, its clear edges and green spaces, its atmosphere and the views in and out of the city. However, insufficient provision was being made to meet the scale of development now required, and for over 15 years the city has been considering its options for growth and change.

5.40 The chosen response has been a major urban extension to the north of Winchester. The idea was first proposed as a fall-back option in the Hampshire County Structure Plan adopted in 2000 to be used if other land supplies proved insufficient, but the momentum built thereafter. The City Council has faced this prospect with some reluctance and with considerable uncertainty caused by a continually changing strategic planning policy background at national and regional level. The selected site is on land comprising a green finger into the city, but out of view of the historic city despite being very close to it. Extensive studies have established this this would be the least damaging location for such an extension. A new urban edge is to be created, and the aim is to help incorporate the extension into the city (similar to other residential areas just beyond the centre). Permission for the scheme has been granted.

5.41 Given the numerous constraints on development around Winchester, deciding which of these mattered most was important. When faced with difficult development options, authorities need to be clear what it is that really is special, not only in the proposed

development area but in the city as a whole. What aspects of the landscape should the urban extension most respect, and how can this best be done? The Winchester experience also shows that planning for a major scheme like an urban extension can be achieved most effectively if the authority works closely with others so that they too respect the town: not just the developer but agencies such as the Highways Authority. The transparency of the City Council's proposals and engagement over the years were appreciated, even by those who took other views. The authority found, unsurprisingly in retrospect, that even where development will take place that will compromise historic landscape setting, constructive discussions with the developer through the whole process can result in a scheme that better reflects the characteristics of the town or city and achieves more benefits.

Review of significant heritage issues as they apply in all case study cities

5.42 The case studies individually describe how local authorities have used different methodologies to respond to the growth pressures they face. Greater understanding of their activities and an improved context can be provided by making comparisons of them all against important heritage considerations. This section therefore reports for each city:

– the share of local growth being taken by the city;
– the evidence base available and used for planning purposes; and
– the Conservation Officers available.

Proportion of local growth taken by case study cities

5.43 Each case study city is taking a share of the development needed in its local authority area. Housing requirements are the principal aspect of development in all areas, needing substantially more land than any other type of development. The proportion of housing growth allocated to each city can be compared with the current scale of residential development (measured as population) in each local authority. This gives a measure of local authority response to the development pressures and opportunities which each city faces. The results are given in Table 8, using population figures derived from the 2011 Census and housing figures for the years ahead taken from local authority development plans (figures may change in plans not yet adopted).

5.44 The administrative boundaries of Oxford and Cambridge City Councils are drawn particularly tightly around their urban areas. In places the built-up areas extend slightly beyond the administrative area into neighbouring authorities. In these cities the planned level of growth is entirely allocated to the city. Elsewhere, the case study city lies within a larger administrative area, and the local authority has choices about how to distribute needed urban growth. Table 8 shows the results of those choices.

5.45 Table 8 shows a spread of strategies. Bath is proposing to take exactly its 'fair share' of the local authority area's development in relation to its current size, and the same is nearly true in Chester. The only allocation of housing significantly below the city's share of existing development is in Winchester, seven percentage points down. This is further evidence of the severe difficulty that Winchester faces in reconciling urban growth with its heritage, as the allocation to the city already includes the 2,000 dwellings in the urban extension reviewed in Appendix 10.

Table 8 Case study city shares of housing development within their local authorities

	Bath	Cambridge	Chester	Durham	Lichfield	Oxford	Salisbury	Winchester
2011 population of city[1]	95,000	145,818	86,011	47,785	32,877	159,994	[2]48,327	45,184
2011 population of LPA[1]	176,000	123,867	329,608	513,242	100,654	151,906	[3]116,000	116,595
City share of 2011 population	**54%**	**n/a**	**26%**	**9%**	**33%**	**n/a**	**42%**	**39%**
Additional dwellings in plan period city	[4]7,020	[5]14,000	[6]5,200	[7]5,220	[8]3,912	[9]8,000	[2,3]6,060	[10]4,000
Additional dwellings in plan period LPA	[4]13,000	[5]14,000	[6]22,000	[7]31,400	[8]10,030	[9]8,000	[3]9,900	[10]12,500
City share of housing growth	**54%**	**100%**	**24%**	**17%**	**39%**	**100%**	**61%**	**32%**

Sources

1. From www.lovemytown.org.uk
2. Figures include Wilton as well as Salisbury
3. Source: South Wiltshire Core Strategy, adopted February 2012
4. Source: Bath & North East Somerset Core Strategy, adopted July 2014
5. Source: Cambridge Local Plan 2014: Proposed Submission, July 2013
6. Source: Cheshire West & Chester Local Plan Submission Document, December 2013
7. Source: County Durham Plan Pre-Submission Draft Local Plan, October 2013
8. Lichfield District Local Plan Strategy Submission document with modifications, January 2014
9. Source: Oxford Core Strategy 2026, adopted March 2011
10. Source: Winchester Local Plan Part 1 Joint Core Strategy, adopted March 2013

5.46 The other three cities are allocated a disproportionately large share of housing growth in relation to their current size. Prior to local government reorganisation in 2009 which affected Salisbury (Salisbury District Council being merged into a larger Wiltshire Council) and Durham (the City Council being merged into a larger Durham County Council), each of the three cities was the largest settlement in its authority. The allocations are not necessarily surprising as there is some limited experience of large amounts of growth being handed to already large settlements, on the basis that this is more 'sustainable', irrespective of heritage issues (though there is no evidence of a pattern to this: see paragraph 2.22 above). Greater protection can then be given to villages and small towns where even modest numbers of dwellings could involve disproportionate growth or change in the character of the settlement. This appears to be the case in Lichfield District Council, where the largest amounts of development have been allocated to the most sustainable and accessible locations: Lichfield has railway stations on both the west coast mainline and a local line. Amongst the 20 towns studied in chapter 3 the same factor appeared to affect the development allocated to towns such as Stowmarket and Wymondham (as well as in those authorities where single towns covered a large fraction of their local authority areas).

5.47 The relatively large allocations to Salisbury in the South Wiltshire Core Strategy adopted in 2012 and to Durham in its submitted Local Plan, however, are deliberate. In Salisbury, the local authority aims to attract more people to the city to stimulate investment notably in employment. In Durham the city is viewed as the economic powerhouse of the

subregion where the plan submitted for examination concentrates growth in order to benefit its surrounding area of weakly-performing former coalmining towns and villages. In both cases the marriage of the growth intended with the heritage interests of the city has been challenging, as Appendices 6 and 9 explain.

5.48 The overall impression from the figures is that heritage has rarely been a key consideration in the selection of a housing allocation to a city. Only in Winchester is there clear evidence that heritage has influenced the allocation, with some evidence for it in Oxford. Note that the local authorities covering Bath, Chester and Cambridge all expect to meet their 'objectively assessed need' for housing within their authority boundaries, whereas the allocations adopted in Oxford would not.

Evidence base for forward planning in the case study authorities

5.49 Table 9 presents information on the documentary evidence available to the authority covering each case study city to assess the character and setting of the city. This is presented on the same basis as Table 3 for the 20 historic towns reviewed in chapter 3, though the documents are listed in footnotes as well as identified by their date in Table 9.

5.50 Table 9 shows that most local authorities have a range of heritage information available to inform their planning decisions. However, the striking feature of Table 9 is that in 2014 three of these important historic cities have no Conservation Area Assessments (Bath, Chester and Oxford) and in two more the emerging draft CAAs have yet to be formally adopted (Durham and Salisbury). This suggests that the opportunities offered by Conservation Areas are far from being fully realised, and that these local authorities are relying on other mechanisms to provide appropriate handling of urban change in their historic cores. For example, the characterisation work in Chester may well cover much of the likely content of a Conservation Area Appraisal.

5.51 Nonetheless, the fact that five out of eight major historic cities studied do not have adopted Conservation Area Appraisals does raise important questions which require further investigation on a national scale. Why are they prepared for some historic towns and cities but not others? Under what circumstances do they offer few benefits? Can the benefits which they offer be achieved by other means? Are the costs of preparation disproportionate to the benefits? Should they be abandoned? What features should they contain to maximise the benefits they offer? Does Conservation Area status confer too few benefits in principle to justify Conservation Area Assessments everywhere? Is the preparation of Conservation Area Appraisals seen as a low priority and if so, why?

Conservation Officer staff in the case study authorities

5.52 Many of the local authority officers interviewed for this study, both in the case study cities and covering the 20 historic towns reviewed in chapter 3, commented that limitations on Conservation Officer staff numbers were constraining the activities they wished to undertake. Conservation staff had not been immune to the cutbacks in local government expenditure during the recession, but there were concerns that the loss of even one member of staff had in some cases substantially curtailed involvement. In some

Table 9 Case study cities' documentary evidence base by category (with dates published)

Town	Conservation Area Appraisal*	Landscape Character Assessment	Historic Characterisation	Urban Design Guidance	Town Study
Bath		SPG 2003[1] Part 2006[2]		[2010][3]	2005[4] 2011[5] SPD 2012[6]
Cambridge	2006[7]	2003[8]		2012[9]	2002[10]
Chester			2012[11]	2012[12]	1994[13]
Durham	Draft emerging	2008[14]	2013[15]		2006[16]
Lichfield	1999[17], 2010[18]		2006[19]	2007[20]	
Oxford		2002[21]	2012[22]		
Salisbury	2012 (draft)[23]	2008[24]	2009[25]	SPG 2006[26]	2008[27]
Winchester	2002[28]	1994[29], 2000[30], SPG 2004[31]	1998[32], 2004[33]		1998[34] 1999[35]

Notes

* Includes Conservation Area policies and management proposals

Square brackets indicate that the document appears to be barely used for purposes relevant to this research

1 Rural Landscapes of Bath and North East Somerset: A Landscape Character Assessment
2 Landscape and World Heritage Study of the Potential for an Urban Extension to the S/SW of Bath
3 Bath Building Heights Strategy (not adopted)
4 Bath City-wide Character Appraisal
5 World Heritage Site Management Plan 2010-16
6 World Heritage Site Setting
7 Cambridge Historic Core Appraisal Conservation Area Appraisal
8 Cambridge Landscape Character Assessment
9 Guidance for the application of Policy 3/13 (Tall buildings & the skyline) of the Cambridge Local Plan 2006
10 Green Belt Study
11 Chester City Centre and Approaches Characterisation Study
12 Chester One City Plan – Manifesto for Contemporary Design
13 Chester: The future of an Historic City
14 County Durham Landscape Character Assessment
15 County Durham and Darlington Historic Landscape Characterisation
16 World Heritage Site Management Plan 2006
17 Lichfield City Conservation Area
18 Lichfield City Conservation Area Appraisal
19 Staffordshire Historic Landscape Characterisation
20 Residential Design Guide
21 Oxford Landscape Character Assessment
22 Central Oxford Historic Urban Character Assessment
23 City of Salisbury Conservation Area Appraisal and Management Plan Final Draft
24 Salisbury District Landscape Character Assessment
25 Salisbury Historic Environment Assessment
26 Creating Places: A guide to achieving high quality design in new development, Salisbury DC
27 Settlement Setting Assessment
28 Winchester Conservation Area Project 2003
29 The Hampshire Landscape
30 The Hampshire Landscape: A Strategy for the Future
31 Winchester District Landscape Character Assessment
32 Hampshire Historic Landscape Assessment
33 Historic Landscape Character Assessment (in *Winchester District Landscape Character Assessment*)
34 Winchester City and its Setting
35 Future of Winchester Study

authorities the capacity now existed only to perform the minimum statutory functions associated with the job, such as responding to applications for listed building consent.

5.53 The issue of staff availability was examined on a consistent basis across the eight case study authorities, and the results are presented in Table 10. The area of responsibility covered by Conservation Officers may not be comparable where staff have responsibilities not only in the city but in the surrounding area too. The numbers are often indicative rather than rigidly accurate, reflecting staff memories and local knowledge rather than any formal examination of employment records. Other reasons why the figures may not be strictly comparable with each other are indicated in the comments section. Presenting the staff levels against comparable measures of workload has not been practicable for this project.

Table 10 Change in no. of Conservation Officers in case study cities (full time equivalent)

City	Number of Conservation Officers about 5 years ago	Number of Conservation Officers in spring 2014	Comments
Bath	5	3	Three planners are being given limited training in Conservation
Cambridge	4	<3	Manager now devotes less than full time to Conservation
Chester	7	2	Establishment reduced from 7 to 4 at local government reorganisation
Durham	9	7	Numbers difficult to judge due to local government reorganisation in 2009
Lichfield	2	1.6	Excludes part of team manager's time
Oxford	12	7	Team includes archaeology, trees and biodiversity staff
Salisbury	3	2	
Winchester	3.75	3.25	Staff have extra responsibilities now

5.54 A clear feature of Table 10 is how few Conservation Officers are currently employed in some of England's most important historic cities, even allowing for the inaccuracies inherent in the figures. These findings are broadly in line with national findings on expert advice on the historic environment, design and place-making available to local authorities, which show that the number of staff providing conservation advice dropped by 33% between 2006 and 2013 (*A fifth report on Local Authority Staff Resources*, July 2013, Association of Local Government Archaeological Officers, the Institute of Historic Building Conservation and English Heritage). Voluntary sector organisations were frequently seriously concerned about the adequacy of staff levels, which generated particularly animated views. In at least one case there was a view that the cutbacks to Conservation Officer staff had been a deliberate political act to play down the conservation role. Officers tacitly seemed to accept in some cases that there were not enough staff to do the job satisfactorily. Interviewees identified a wide range of difficulties in consequence, aside from staff morale:

- staff who retired or took maternity leave might not be replaced, leaving authorities exposed with wholly inadequate professional cover;
- casework had to be compromised to handle the scale of the workload;
- matters other than casework often had to be neglected for long periods or put to one side completely, e.g. on conservation areas;

- outside consultants would be used for conservation studies instead of in-house staff, which was not always successful as they sometimes had inadequate understanding of the locality to do a good job;
- salaries offered were too low to attract candidates of the calibre and status required for senior planning and conservation posts;
- Conservation Officer expertise was being sold to the authority's property services arm: this brought in money to the Department but took time away from other priorities;
- some town planners were being given modest training in conservation issues, but this was a poor substitute for properly trained and qualified Conservation Officers.

5.55 The structures within which Conservation Officers work are important as well their numerical strength. Local authority interviewees were therefore asked whether heritage had senior representation amongst planning officers and whether there was sufficient engagement of heritage staff with councillors.

5.56 In the majority of local authorities heritage was represented well enough at senior officer level, either by the head of heritage services holding a senior post or by chief and senior officers being supportive of conservation objectives. However, there were two cities where supportive structures had been lost in internal reorganisation, so that heritage was now a minor activity in a structural backwater.

5.57 There was a similar pattern with access to councillors: Conservation Officers in the same two cities which had suffered from internal reorganisations also had no direct access to councillors (e.g. there was no Heritage Champion and other members were not interested). However, there were Conservation staff in other authorities who also did not have access to councillors. In contrast, staff in three authorities spoke positively about member involvement in conservation.

5.58 The findings from the case study cities broadly reinforce the conclusions drawn from the 20 heritage towns studied in chapter 3: the cultural approach to heritage, driven by councillors, has a significant bearing on conservation staff and the scope for their role to be fulfilled thoroughly. However, the position has been reached where none of the cities studied has sufficient staff in place to achieve conservation outcomes to the standards they aspire to (though the scale of the deficiencies varies). In our view this is not a matter of aspirations always exceeding resources, but a real issue with identifiable shortcomings resulting. This is a direct consequence of staff cuts (often from an already low base) and associated budget constraints.

5.59 In our view, there has been a remarkable loss of perspective in a few authorities. All the historic cities studied now depend on a significant tourist industry, in some cases underpinning the local economy. This brings in prodigious wealth in some cases, all the more important when the local authority is itself a significant local landowner. This wealth is generated fundamentally by the physical environment and especially the built heritage. The maintenance of this built heritage and the avoidance of direct damage to it or inappropriate change to its context is the task of a tiny group of individual Conservation Officers in each city, yet their numbers and sometimes their status and ability to do their job are sometimes being undermined. Over a period this will increasingly put at risk the fabric

and especially the atmosphere and enjoyment of historic cities. The paltry savings on modest salaries seem wholly misplaced in relation to the benefits on offer from retaining and augmenting Conservation staff. The costs would be barely detectable in relation to the wealth which the historic environment brings to these cities. This is a matter to which historic cities have clearly not given much thought, even in those which realise that heritage is good for the economy rather than a drag on it. Partly behind this is perhaps an undercurrent of feeling, detectable in many administrations, that historic buildings and their surroundings are simply 'there' and look after themselves. Changes on the ground do not register strongly from one year to the next, but over time they do. By then it may be too late, with inappropriate uses allowed in the wrong place, vistas compromised, shoddy materials and design becoming only too apparent, and people with the drive to stem the tide strangely absent.

Cross-cutting heritage issues in the case study cities

5.60 Some influences on local authorities' efforts to reconcile growth with heritage arose in interviews in a small number of cities only but appeared to be significant there. These were not topics built into the interviews, and so have not been studied systematically, but they were matters which some interviewees or the researchers found important. This section comments on them, as follows:

– cross-boundary planning issues;
– local government reorganisation;
– student accommodation;
– development on local authorities' own land;
– development limits in historic towns and cities.

Cross-boundary planning issues

5.61 The development needs of some of the case study cities will not reliably be met in future without compromising important heritage unless the local authorities responsible obtain co-operation in the development process from neighbouring authorities. This is a direct consequence of the likely scale of future growth in relation to the boundary of the authority and the capacity of the historic city. It is not a measure of simple resistance to development in principle in the historic city.

5.62 The greatest difficulty is faced by Oxford, a city with a tightly drawn administrative boundary and substantial development pressures. A Strategic Housing Market Assessment carried out across Oxfordshire (G L Hearn, March 2014, Oxfordshire County Council) concluded that the housing need in Oxford for which provision needed to be made was 1,200-1,600 dwellings annually. This contrasts with the Core Strategy adopted by Oxford City Council in March 2011, based on earlier assessments of reasonable supply opportunities against anticipated housing need, which fixed planned supply with the city boundary at 8,000 dwellings over the period 2006-26, i.e. just 400 dwellings annually. Scope for the provision of related urban development such as schools, healthcare facilities, employment and other infrastructure are likewise constrained by the administrative boundary of the city.

5.63 The two other case study cities constrained by tightly-drawn administrative boundaries are Cambridge and Bath. Bath has a recently adopted Core Strategy in which housing supply is planned to meet objectively assessed need within the authority area, and the City of Bath is taking its fair share of this (see Table 8), while Cambridge City Council is similarly proposing to meet housing need within its area in its Core Strategy submitted for examination. In both cases, however, the long-term continuation of current proposed rates of development is in our view unlikely to be capable of being fulfilled without discernible or possibly significant impact on the heritage of those cities.

5.64 In the case of Cambridge, the housing market and development patterns are already operating in effect on a subregional basis, largely contained within the areas of Cambridge City Council and its neighbour South Cambridgeshire District Council. Here, substantial growth associated with the city is formally attributed to South Cambridgeshire and is proposed to be met within that District: a joint examination of the Councils' Core Strategies is taking place in 2014 in recognition of the close functional relationship between them. An important feature of planning in Cambridge, noted in the case study in Appendix 4, is the close co-operation between the two councils over the scale, locational priorities and practical implementation of development. This is making a significant difference directly and indirectly to the City Council's ability to protect its historic core (and the District Council's ability to tie its employment, service provision and transport infrastructure to its housing provision).

5.65 Whereas Cambridge is benefiting greatly from cross-boundary co-operation between local authorities in the subregion, Oxford is not. We are advised that Oxford City Council's neighbours are broadly reluctant to take on the city's growth requirements within their own areas. In Bath the need for such co-operation was found unnecessary in deciding the council's recently approved Core Strategy, though this cannot be assured when that Plan is next revised. There is a clear need for historic cities to articulate their development needs and explain when these would be better achieved in neighbouring areas to protect nationally or locally important heritage interests. Neighbouring authorities are under a Duty To Co-operate (under the Localism Act 2011) so that development can be co-ordinated across administrative boundaries. Inspectors of development plans will need to be alert to the heritage dimension of this co-operation. The matter would be facilitated if the Government improved the arrangements for town planning on a 'larger-than-local' basis, to ensure that wider public interests can be satisfied when co-operation falls short of agreement.

<u>Local government reorganisation</u>

5.66 Three of the case study cities were affected by local government reorganisation in 2009. In each case this has had discernible unintended consequences for the heritage of these cities. The changes were:

– Salisbury was affected when Salisbury District Council merged with other authorities to form Wiltshire Council;
– Durham was affected when Durham City Council merged with other authorities to form Durham County Council;

– Chester was affected when Chester City Council merged with the Boroughs of Ellesmere Port & Neston and Vale Royal to form Cheshire West and Chester Council.

5.67 At the time of reorganisation Salisbury District Council was well-advanced in preparation of the South Wiltshire Core Strategy and this proceeded to adoption in February 2012. This will remain in place until superseded by the Wiltshire Core Strategy for which an Examination was held in 2013. A single Plan for the whole of Wiltshire inevitably signals changes and the dilution of the priorities set specifically in Salisbury District and for its principal settlement, the city of Salisbury. The centre of gravity of decision-making moved to the Council's main offices in Trowbridge. Councillors in Salisbury have nevertheless been supportive of protecting the setting of the city and sensitive to heritage issues: this is critical for the way the city looks, and the historic townscape has been the key to what makes the town special. It is understandable that councillors elected elsewhere in the new Wiltshire Council should feel less attachment and commitment to Salisbury. A Design Forum organised by Salisbury District Council to advise members on the design aspects of new developments was abolished by Wiltshire Council.

5.68 The case study of Salisbury in Appendix 9 describes an important change to planning policy which will affect the setting of Salisbury as a direct result of the Core Strategy for the district area, the South Wiltshire Core Strategy, being replaced by a Core Strategy for the whole of Wiltshire. A local policy firmly committed to ensuring there will be no detriment to the visual quality of the landscape setting of Salisbury (and Wilton), reinforced by an area to which this applies defined on the Proposals Map, will be replaced by a more general policy capable of applying to towns across Wiltshire. Developers will be less clear about what is expected of them, so deliberate or inadvertent challenges to the objective will be more likely. Implementing the new policy in Salisbury will be achievable, though it will be more time-consuming and will rely on more careful evaluation of development proposals by Conservation Officers and planners, at a time of resource limitations. This carries greater risk.

5.69 The City of Durham is the jewel in County Durham. The new Durham County Council has taken a different view from the former Durham City Council about how that jewel should serve the public interest. Whereas the City Council had a strong commitment to maintaining the setting of the city as a priority, the County Council has identified a pressing need to take bolder steps to support the economy of the wider county, parts of which continue to suffer badly from the closure of the coal mining industry. The new Council wants the economic beacon of Durham to burn brightly for the benefit of the whole County, and this involves a change of direction from the City Council in relation to development in and around Durham. The Green Belt introduced by the City Council is now proposed to be relaxed in places to accommodate additional development. This matter will be considered at an examination of the County Council's Core Strategy in 2014. The planning function in the Council is geared to supporting economic development and the emphasis on the wider setting of the City of Durham is being reduced.

5.70 Prior to local government reorganisation, Chester City Council had a boundary where Green Belt designation constrained the outward growth of the city and opportunities for development were relatively limited. The incorporation of a wider area into the authority

covering Chester had a different effect from that in Durham. The new Council now had a wider choice of sites within its boundary which could accommodate development beyond the Green Belt. In principle this could take some pressure off the historic core of the city.

5.71 Overall, local government reorganisation can set in motion changes which have consequences for heritage. As 'efficiency' is a key motivation for reorganisation, the inevitable restructuring of posts and establishments can lead to a reduction in the numbers of experienced and qualified Conservation Officers. Heritage issues are unlikely to be a primary determinant of the form which local government takes, but the experiences of Salisbury, Durham and Chester suggest that greater consideration needs to be given in advance to the nationally important heritage of such cities so that appropriate safeguards can if necessary be put in place. Of greater importance than the technical aspects of how the planning system and conservation powers will be applied is an appreciation of the political consequences of reorganisation for heritage at the local level. Raising the importance of heritage at an early stage may help to establish more reliable ground rules for heritage in the operation of the reorganised councils.

Student accommodation

5.72 All the case study cities except Lichfield and Salisbury are university cities. Most of them are experiencing or expecting rising student numbers, and this creates a demand for additional student accommodation. Students can sometimes be accommodated on the university campus but, equally, blocks of student flats may be placed on sites acquired within the host cities. Universities generally cannot meet all their student accommodation needs in purpose-built premises, and the result is students occupying rented houses which would otherwise be available to more permanent households for owner-occupation or long-term lettings. Student 'quarters' arise in most university cities, initially driven by houses suited to multiple occupation and then reinforced as non-student households move out and students come to dominate particular streets and areas. These areas typically become associated with noise, activity at antisocial hours, limited maintenance and deteriorated gardens and surroundings. Historic cities are no different from others in these respects.

5.73 Rising student numbers can be a particular problem in historic cities. In places already struggling to reconcile heritage with development, student accommodation can represent competition for space. Some of this is completely beyond planning control: there is nothing to prevent buy-to-let landlords providing a service to students, for example. Also wealthy parents may buy property on the open market for their student offspring, which can have unexpected impacts on markets for new property (e.g. acquisition of new flats in central Bath particularly by Chinese investors on this basis). Some universities like Bath and Bath Spa may be able to accommodate some additional students on campus, but others cannot. The research identified particular pressures in Cambridge, Chester, Durham and Oxford.

5.74 The expansion of Cambridge University and Anglia Ruskin University's Cambridge campus can be felt in the town. In addition to schemes within College grounds in recent years, 1,250 flats targeted at the student market are currently under construction near the

station (at some distance from both Universities), clearly in competition with alternative occupants in the City Council's promotion of urban land redevelopment.

5.75 Cheshire West and Chester Council is supporting the provision of specialised student accommodation through Policy SOC3 *Housing mix and type* in the submitted Local Plan, provided this is in appropriate, accessible locations convenient for the facilities at the University of Chester. However, the Chester Civic Trust argues that insufficient attention has been paid to the practicalities and consequences of accommodating 13,000 students in Chester. For example, they consider the redevelopment of a former Travelodge hotel for student accommodation at Delamere Street inappropriate. Also the proposed redevelopment for student accommodation of the car park on St Martin's Way opposite the Crown Plaza hotel was too large and likely to have damaging effects on the historic buildings off City Walls road and on views into the city on approaches from the west, south-west and north.

5.76 In Durham, there are currently about 15,300 students studying in the city, representing a particularly large proportion of residents (see Table 8) during term time. Students are therefore integral to the local economy but also cause seasonal demand. Over half these students live in properties around the city rather than in purpose-built accommodation, which has a significant impact on the local housing market. The University owns the Castle and many properties in the Conservation Area in the city centre, on the one hand exercising responsibility in managing this property but on the other affecting the dynamics of the city. The number of students is expected to grow further to 17,100 by 2020, but purpose-built accommodation is expected to keep-up with the growing requirements.

5.77 There is continuing pressure to build student accommodation for the two Universities in Oxford. This is arising both within College grounds (e.g. this year at Merton College for university postgraduates rather than for its own needs and at Exeter College) and within the wider city. The student accommodation built at Roger Dudman Way attracted a particularly high level of criticism for its impact on the views of Port Meadow (Figure 11). However, in a notable response, this led to an independent review of the Council's handling of the decision. Subsequently, an Oxford Design Review Panel was established by the City Council in partnership with the Commission on Architecture and the Built Environment (at the Design Council) to "ensure that there is a consistently high standard of design for significant built environment projects, embedding best practice into the planning process at this exciting stage of Oxford's development. The ODRP will consider a broad range of projects, including housing, infrastructure, civic buildings and the public realm, promoting consistency in design as the city develops." This is potentially an important step forward to address perceived shortcomings in existing processes.

5.78 Voluntary sector representatives interviewed in all six university cities volunteered (unsolicited) their concern about the impact of student accommodation in one way or another. The principal concern was that 'studentification' of 'their' cities is an issue they feel is not addressed adequately. In addition some referred to a degree of disengagement by the universities in recognising the combined effects of growth in student numbers, the

associated need for accommodation, how this affects the older stock, and the distortion that this can have on the local housing markets and housing stock.

5.79 The Universities are powerful local institutions in all cities, with their own aspirations for the facilities and accommodation they seek, and local authorities are alert to the benefits which students bring as well as the problems. Nonetheless, there are heritage-related issues which Councils need to address in addition to the widely-experienced problems of impacts on local housing markets. These include impacts of students on townscape character, especially in Conservation Areas, the design quality of new accommodation, and the visual effects of new accommodation on townscape, vistas and skylines. The taking over of streets as rented accommodation is beyond planning control, but the regulation of new accommodation is well within it and should be given greater attention. More fundamentally, there appears to be no forum for discussing the principle of whether, to what extent or how particular universities should be allowed to expand their campuses in historic towns and cities. Universities for the most part are state-funded bodies where the state is entitled to expect a more prominent ethos of respect for the local heritage to be built into universities' strategies.

Figure 11 Flats at Roger Dudman Way, Oxford

View from the village of Wolvercote across Port Meadow to the north-west of the city. The flats at Roger Dudman Way, to the right of centre, have been heavily criticised.

Development on local authorities' own land

5.80 Development by local authorities on their own land was generally found to be unremarkable. However, in a few cases concerns were expressed in interviews that the local authorities responsible were undertaking schemes without showing exemplary standards in keeping to the usual local development policies. Although not a widespread problem, some councils were said to be less keen to apply heritage-related policies constraining development on their own land than on other developers' land. This resulted in buildings with a scale and massing out of character with their surroundings and in some cases adversely affecting the setting of key buildings. The approach risked undermining the

effectiveness of the policies and the general acceptance of them. Specific cases in Lichfield (Figure 12) and Taunton are noted below.

5.81 Policy T33 of the Taunton Deane Local Plan 2004 provides that "Development which would detract from the distinct character and attractiveness of Taunton's skyline will not be permitted", with specific reference to the town's dominant church towers which are visible from several viewpoints. However, in the Firepool regeneration scheme in Taunton, on the Council's own land, development was permitted to a greater height than would normally be acceptable. When built the scheme will be very visible from the railway and elsewhere and have some screening effect on the heritage of the skyline. The decision has led to other taller buildings being proposed on higher ground, and the long-established policy on height limits in Taunton is under threat.

Figure 12 Development on local authority-owned land, Lichfield

Local organisations expressed concern about the scale and massing of this development on Lichfield District Council-owned land which has obscured views of the spires from a very public viewpoint.

Development limits in historic towns and cities

5.82 Interviewees in some of the case study cities, as well as in some of the historic towns reviewed in chapter 3, argued that their settlement was effectively 'full' and should not be asked to accommodate substantially more development. There is clearly a serious issue facing some historic settlements about the pace of change they should absorb and their overall capacity to go on doing so indefinitely. The evolutionary process is marked by change and growth in historic settlements, but has the time come for some of them to

accept that limits have been reached and future evolution must be within a more limited context?

5.83 A review of this is beyond the scope of the present study, though questions have been firmly raised in some places. The idea that there is a physical threshold to future development beyond which decline in the character of a place sets in would have to confront numerous theoretical and practical problems. Some of these are set out in Appendix I of *Environmental Limits for the South East* (Levett-Therivel, 2010, South East England Partnership Board). Values change, of course: some historic settlements were no doubt considered 'full' 50 or 100 years ago when they were much smaller. The future holds something different from the past, but should the character of a place be locked-in at a particular date, or should it be allowed to evolve further? How do heritage values tie in with other objectives for the life of towns and cities? Can change be controlled to a lesser, more manageable rate than at present, or carried out in ways which are less likely to challenge the distinctiveness of a place? Are the alternatives to continued evolution of existing historic settlements better or worse (and who says)?

5.84 Amongst the case study cities studied for this project, Winchester and Oxford were those with the most immediate claims for this issue to be addressed, at least in relation to the amount of growth they are currently expected to accommodate (see paragraphs 5.43-48 above). Likewise, some of the historic towns studied in chapter 3 are urgent candidates, such as Berkhamsted and Woodbridge. This is a debate which needs further attention.

Commentary

5.85 The objective when identifying methodologies for reconciling growth with heritage in eight case study cities was to illustrate good practice. The cases show that there is indeed much to report from all of them which is successful and offers lessons for application elsewhere. However, cities are complex places and pure examples of undiluted excellence are aspirational. All the case studies had blurred aspects of policy and practice. The cases also showed that the best solution – the best methodology for reconciling growth with heritage – is a matter for local choice depending on circumstances. A Green Belt would not resolve Salisbury's challenges just as View Cones would not tackle Chester's. There is scope, though, for more than one methodology to be used at the same time. For example, Green Belts to contain urban sprawl are typically associated with urban intensification, and especially in these circumstances (but elsewhere too) a sound design response to the historic environment can be critical to good practice.

5.86 The message from the case studies is therefore that there are plenty of approaches in policy and practice which can help to conserve the special character of smaller cathedral cities and historic towns in their settings while provision is made to accommodate the future development needs of these settlements. Giving sufficient weight to these approaches has often required perseverance from heritage interests. Helping the right outcome from a heritage point of view is best achieved by co-operation, gathering public support, sticking to clearly established heritage principles and policies, and taking a positive view about what can be achieved. When heritage is seen as a benefit rather than a problem, the reconciliation with economic development becomes easier. Part of this

process is to make a real effort to find ways of accommodating necessary development. That can be more easily said than done, though, as many towns and cities are approaching or feel themselves already to have reached the limits of their development.

5.87 The case studies, like the study of 20 historic towns in chapter 3, have shown that methodologies alone will not resolve the growth pressures which historic places face. There are vitally important underlying matters that must be resolved at the same time. The key one is the need for a properly resourced Conservation and Design service in local government. Only if there are enough professionals to pursue the objectives will there be any hope of achieving good results. Cutbacks in local government and prioritisation of statutory obligations, although understandable, have not served local heritage interests well and this needs to be tackled as a priority. The other essential matter to address is cultural. The level of interest in heritage amongst local councillors needs to be sufficient in order to set up the circumstances where reconciliation between growth and heritage is a realistic proposition. It is from elected members' priorities that flow key choices about matters such as: which policies to adopt, how energetically to apply them, the number of Conservation Officers to employ, and the expectations imposed on all other parties from officers to developers. There is scope for a virtuous circle in which high standards generate goodwill towards both heritage and development, add value to investment and inspire improvements to the built environment. This needs to be nurtured, as there is plenty of evidence that it will not come automatically.

5.88 Finally the evidence from the case studies is that heritage is not in a silo but integrally linked to wider issues and should be addressed as a corporate issue in local government. The chosen case studies identified matters such as student accommodation, cross-boundary planning and local government reorganisation to be more awkward than had been expected and having unexpected consequences for heritage. There clearly remains a substantial debate to be had about how much growth some historic towns and cities can take and how it should be provided.

RECOMMENDATIONS

Local councillor engagement with heritage

1. The research has demonstrated that the single most vital issue affecting the attention to the historic environment in relation to growth pressures is the cultural approach of the local authority. From this follows decisions about: the policies to adopt, decisions on planning applications, the size of historic environment and design team to employ, the proactive work on heritage undertaken, and the attention which developers are expected to pay to heritage issues. English Heritage should increase its efforts to impress upon local authorities and Government the vital place which the historic built environment of towns and small cathedral cities has in the life of their residents and of the country.

2. From interviews it was clear that there were a number of underlying opinions among elected members and senior planning officers which should be challenged in responding to recommendation 1, including that:
– the historic built environment can look after itself;
– historic buildings are a cost rather than a benefit; and
– heritage gets in the way of investment rather than adds value to it.

3. The study found that there was a largely missed opportunity to promote the historic environment in local authority Corporate Plans. These documents show a direction of travel for local administrations that can anchor more specific proposals through the planning system and through other local choices (e.g. appointment of Heritage Champions). English Heritage should encourage local authority councillors to consider including suitable local heritage objectives as one of the priorities in their Corporate Plans.

4. The research clearly demonstrates that the historic environment at the whole town scale can be difficult to reconcile with urban development where a local authority's administrative boundaries are tightly drawn. Particularly in these cases, active co-operation should be sought by councillors and their officers with nearby authorities to address the issues, modelled on the approach in the Cambridge sub-region.

Conservation Officers

5. Local authorities responsible for the management of England's important historic places should ensure that they have adequate expert advice available in historic environment (building conservation/archaeology), design and place-making. Having sufficient expert advice is the most important practical step that can be taken to reconcile the protection of heritage at the whole town scale with the needs for urban growth. The study has shown that the practical capacity of local government staff to pursue strategic or innovative approaches in support of heritage has been diminished by reduction in service levels so that there would be little prospect of other bold initiatives being successful without this recommendation being satisfied first.

Development Plans

6. This study has shown that three out of eight important historic cities analysed as part of the project do not have Conservation Area Appraisals (CAAs) or Management Plans, and that two more have not yet adopted them. This is in contrast to a study of 20 historic towns which found that three quarters did have CAAs and that this was the most popular form of evidence available on the local built heritage. An evaluation of conservation areas is needed to understand the reasons why Conservation Area Appraisals and Management Plans are undertaken in some historic towns and cities but not others, and whether any further encouragement is needed through amendment of Government policy and guidance and advice from English Heritage.

7. The study found that many local planning authorities had adequate or good policies for protecting the character, townscape or setting of historic towns, but that the degree of compliance with these policies when making planning decisions was variable. Local authority monitoring systems should include detailed reviews of the compliance of planning decisions with the heritage policies in their adopted plans.

8. The research found that in some authorities the sustainability appraisal of local plans did not adequately consider the impacts on the historic environment. English Heritage should therefore promote its advice (revised in July 2013) *Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment* to emphasise to local planning authorities how to secure greater benefit from the Sustainability Appraisal (SA) of development plans, in order to bring all authorities up to the standards of the best. SA reports should be expected to:

– use evaluation criteria to identify the impacts of development plans on heritage at the scale of individual settlements (character, townscape, setting);
– reach clear conclusions which exceed simple description;
– offer recommendations on how development plans should be improved.

9. Local planning authorities containing historic settlements should prioritise the adoption of NPPF-compliant local plan core strategies. This is a key requirement in being able to plan successfully for growth while protecting the environment. The study found that a significant number of local planning authorities had not yet achieved this. Local authorities should additionally prepare and adopt development management policies for heritage, in order to meet the requirements of paragraph 126 of the NPPF on heritage and the need to have a positive heritage strategy. The study shows that numerous authorities remained reliant on saved policies from former Local Plans which were in some cases insufficient and out of date. Detailed policies were also required because newly adopted policies in Core Strategies were often not specific enough to be capable of implementation in ways which reliably benefited the historic built environment.

10. Local planning authorities should prepare ‘local lists’ of heritage assets of value locally, as part of their evidence base for the historic environment, with clear policies for their general conservation and enhancement. This would help authorities to achieve the policy intentions of the National Planning Policy Framework.

11. Interviews with both planning authority staff and third sector representatives have helped demonstrate that local authorities were responsive to local efforts to encourage heritage to be taken more seriously, and that local voluntary bodies were an effective way of improving local authority performance on heritage issues. English Heritage should provide information and advice suited to use by local-based voluntary groups supportive of their heritage.

12. The study found that though there were many examples of well-designed new developments in historic areas, there were also cases of missed opportunities and over-developed sites. Local authorities need to be encouraged to take an active approach to requiring high quality design in new development throughout whole historic towns and historic cities. Not only is this consistent with the National Planning Policy Framework, but this study has shown that good design of developments and the public realm generates a virtuous circle which raises standards, expectations, attitudes to development and the quality of schemes within the historic environment.

Methodologies for reconciling town-scale heritage with urban growth

13. This study suggests that there are no methodologies demonstrably better than others, though methodologies can often be used together for greater benefit than single methodologies. Local authorities should be encouraged to pursue methodologies for reconciling heritage with growth which are appropriate to their local circumstances.

14. The potential for using Neighbourhood Plans as a methodology for reconciling heritage with growth at the town scale should be investigated when more of these Plans have been adopted.

15. Local authorities need to be alert to, and English Heritage should press for, heritage constraints to be given greater weight than at present in the allocation of growth requirements, especially housing, to different settlements as part of the local authorities' development allocations in their local plans.

16. In any further local government reorganisation, consideration should be given to any unintended consequences for heritage and how to address them. This will help to continue appropriate recognition of the importance of the historic environment in the operation of the new authorities.

17. A mechanism is required to establish the best interests of historic towns and cities when universities and colleges are considering expansion of their student numbers. The transitory student population can generate adverse cumulative impacts on the character and appearance of historic town and city conservation areas and on public amenity, particularly through significant expansion of student accommodation and other facilities. These need to be addressed alongside the educational and economic benefits from additional student numbers in historic towns and cities. Establishing the public interest amongst the competing issues requires co-operation between the institutions themselves and the interests represented in government by the Departments of Education, Communities & Local Government and Culture Media & Sport.

18. English Heritage, working with other representative bodies, should oversee a debate on the capacity of historic towns and small cathedral cities to accommodate projected levels of urban growth into the foreseeable future, and the necessary responses to the issues raised.

APPENDIX 1

INTERVIEWEES

Case study consultees

Face-to-face interviews were held with the following people:

Bath
LA Heritage: Tony Crouch, City of Bath World Heritage Manager, Bath & NE Somerset Council
LA Policy: Richard Daone, Planning Policy Team Leader, Bath & NE Somerset Council
Third Sector: Caroline Kay, Chief Executive, Bath Preservation Trust

Cambridge
LA Heritage: Glen Richardson, Urban Design & Conservation Manager, and Christian Brady, Conservation Officer, Cambridge City Council
LA Policy: Sara Saunders, Planning Policy Manager, Cambridge City Council (interviewed by telephone), and Jane Green, New Communities Programme Officer, South Cambridgeshire DC
Third Sector: Carolin Gohler, Chief Executive, Cambridge Past Present and Future

Chester
LA Heritage: John Healey, Senior Conservation Officer, Cheshire West and Chester Council
LA Development Management: Fiona Edwards, Head of Development Control, Cheshire West and Chester Council
Third Sector: David Evans, Chairman; Martin Meredith, Secretary & Treasurer; and John Tweed, Architect and Trust member, all of Chester Civic Trust.

Durham
LA Heritage: David Sparkes, Principal Design and Conservation Officer, Durham County Council
LA Policy: Gavin Scott, Area Team Leader, Durham County Council
Third Sector: Roger Cornwell, Chairman; Richard Hird and Tim Clark, all of City of Durham Trust

Lichfield
LA Heritage: Dan Roberts, Urban Design and Conservation Manager, and Debbie Boffen, Senior Conservation Officer, Lichfield District Council
LA Policy: No Policy Officer was available for interview
Third Sector: John Thompson, Chairman, Lichfield Civic Society

Oxford
LA Heritage: Nick Worlledge, Head of Heritage and Specialist Services; Katherine Owen, Senior Conservation Officer; and Clare Golden, Head of Development Control, Oxford City Council
LA Policy: Sarah Harrison, Development Policy, Oxford City Council
Third Sector: Peter Thompson, Chairman, Oxford Civic Society

Salisbury
LA Heritage: Jocelyn Sage, Conservation Officer, Wiltshire Council
LA Policy: David Milton, Development Manager, Wiltshire Council
Third Sector: Richard Deane, Development Committee Secretary, Salisbury Civic Society

Winchester
LA Heritage: Alison Davidson, Head of Historic Environment, Winchester City Council
LA Policy: Steve Tilbury, Corporate Director – Operations, Winchester City Council
Third Sector: Richard Baker, City of Winchester Trust

Historic towns in authorities with post-NPPF adopted Core Strategies

Telephone interviews were held with the following people:

Berkhamsted
LA Conservation Officer: James Moir, Conservation Officer, Dacorum BC (and also Laura Wood, Core Strategy leader, Dacorum BC)
Third Sector: Laurence Handy, Planning Committee chair, Berkhamsted Town Council

Chelmsford
LA Conservation Officer: Michael Hurst, Conservation Officer, Chelmsford City Council
Third Sector: Malcolm Noble, Chairman of both Changing Chelmsford (Community Interest Company) and Chelmsford Civic Society

Chesterfield
LA Conservation Officer: Jacob Amuli, Conservation Officer, Chesterfield BC (and also Alan Morey, Strategic Planning and Key Sites Manager, Chesterfield BC)
Third Sector: Bryan Thompson, Chairman, Chesterfield Civic Society

Folkestone
LA Conservation Officer: Alison Cummings, Design and Conservation Officer, Shepway DC
Third Sector: Richard Wallace, Chairman, Go Folkestone

Hastings
LA Conservation Officer: Jane Stephen, Conservation Projects Manager, Hastings BC
Third Sector: André Palfrey-Martin, Secretary, Save Our Heritage (Hastings)

Henley-on-Thames and Thame
LA Conservation Officer: no-one available
LA Development Plans: Beryl Guiver, Planning Policy, South Oxfordshire District Council
Third Sector: the third sector at both Thame and Henley-on-Thames would have been the Town Clerks at the respective Town Councils, but neither responded to approaches

Ilkeston
LA Conservation Officer: James White, Conservation Officer, Erewash BC
Third Sector: there is no suitable third sector organisation in Ilkeston

Leek
LA Conservation Officer: did not respond
LA Development Plans: Ruth Wooddisse, Senior Planning Officer, Staffordshire Moorlands DC
Third Sector: Mike Stapleton, Chairman, Leek Civic Society

Newbury
LA Conservation Officer: no-one available
LA Development Plans: Bryan Lyttle, Planning and Transportation Policy Manager, West Berkshire Council
Third Sector: Anthony Pick, Vice Chairman, Newbury Society

Selby
LA Conservation Officer: no-one available
LA Development Plans: Andrew McMillan, Policy Officer, Selby DC
Third Sector: Michael Dyson, Chairman of Selby Civic Society and Chairman of Selby District Council

Stowmarket
LA Conservation Officer: Paul Harrison, Conservation Officer, Mid Suffolk DC
Third Sector: Jon Pattle, Stowmarket Society

Taunton and Wellington
LA Conservation Officer: Diane Hartnell, Heritage Lead Officer, Taunton Deane BC
Third Sector: Brian Murless, Somerset Industrial Archaeology Society

Thornbury
LA Conservation Officer: did not respond
LA Development Plans: Rob Levenston, Planning Policy
Third Sector: There is no suitable third sector organisation in Thornbury

Whitehaven
LA Conservation Officer: no-one available
LA Development Plans: Chris Hoban, Planning Policy Officer, Copeland DC
Third Sector: there is no suitable third sector organisation in Whitehaven

Wigan
LA Conservation Officer: Ian Rowan, Wallgate Townscape Heritage Initiative and Conservation Officer, Wigan MBC
Third Sector: Anthony Grimshaw, Wigan Civic Trust

Winchester
LA Conservation Officer: Alison Davidson, Head of Historic Environment, Winchester City Council (face-to-face interview)
Third Sector: Richard Baker, City of Winchester Trust (face-to-face interview)

Woodbridge

LA Conservation Officer: Roger Scrimgeour, Senior Design and Conservation Officer, Suffolk Coastal DC

Third Sector: Neil Montgomery, Chairman of Planning Group, Woodbridge Society

Wymondham

LA Conservation Officer: David Edleston, Conservation Officer (Design Architect), South Norfolk DC

Third Sector: Irene Woodward, Chair of Environment Committee, Wymondham Heritage Society

APPENDIX 2

CONSULTEES ON METHODOLOGIES

Royal Town Planning Institute: Andrew Matheson (Policy and Networks Manager), with responses also from Phil Turner and Liz Wrigley
Royal Institution of Chartered Surveyors: James Kavanagh (Director of RICS Land Group)
Royal Institute of British Architects: Anna Scott-Marshall (Head of External Affairs)
Planning Officers Society: John Silvester (Communications Manager), with response also from John Walker (Westminster City Council)
Landscape Institute: Paul Lincoln (Director of Policy and Communications), with responses also from Stephen Russell and Kate Bailey
Historic Towns Forum: Noel James (Director)
Association of Small Historic Towns And Villages: John Shaw (Director)
Urban Design Group: Robert Huxford (Director)
CABE@Design Council: Kathy MacEwen (Head of Programmes)
Council for British Archaeology: Mike Heyworth (Director)
Campaign to Protect Rural England: Neil Sinden (Director of Policy and Communications)
Town and Country Planning Association: Hugh Ellis (Head of Policy)
Society for the Protection of Ancient Buildings: Matthew Slocombe (Director)
Institute of Historic Building Conservation: James Caird (Consultations Co-ordinator)

APPENDIX 3

BATH CASE STUDY

Special qualities

Bath is a city of 95,000 people in north-east Somerset. The whole City of Bath was inscribed as a World Heritage Site (WHS) in 1987. The reasons for inscription, or attributes of Outstanding Universal Value, can be defined as:

1 Roman archaeology;
2 The hot springs;
3 Georgian town planning;
4 Georgian architecture;
5 The green setting of the city in a hollow in the hills;
6 Georgian architecture reflecting 18th century social ambitions.

The city is largely contained within the bowl of hills surrounding it, often with open green space beyond the built-up area running up to the skyline when viewed from the city. The WHS boundary follows the municipal boundary of the former Bath City covering most of the developed area and some greenspace beyond. The setting of the WHS takes in the surrounding area where change would affect the WHS. The objective is to constrain not only the outward sprawl of Bath but encroachment by development round about which would affect the experience of suddenly entering the city close to its edge. Undeveloped green fingers enter the city from the hills, almost to the centre at some points, providing a remarkably rural feeling for a city of this size, enhanced by the tree-cover within the built-up area. The River Avon carves a valley between hillsides essentially to the north and south, providing a route followed by the railway, Kennet and Avon Canal and major roads. Development focused initially in the valley and then spread up the hillsides.

'.. for the Eye to distinguish the particular Buildings of the City … such as would View them more distinctly must ascend to the Summit of Beaching Cliff', said John Wood, 1763: part of Georgian Bath from Beechen Cliff

Widcombe Hill is a green finger of undeveloped land approaching the centre of Bath from the south east.

The Royal Crescent, seen from Beechen Cliff, highlights its green space context, with open space in front, an approach golf course behind, and undeveloped countryside on the steeper slopes of Primrose Hill above

The World Heritage Site designation

The UK signed the 1972 UNESCO World Heritage Convention in 1984. This committed it to identifying, protecting, conserving and interpreting its World Heritage Sites and passing them on to future generations. There is no legislation on World Heritage Sites in the UK, so implementation of the purposes of designation is left to other mechanisms and is a matter of policy and practice rather than legal obligation. To a very considerable extent it is the land use planning system which provides the vehicle to protect the City of Bath World

Heritage Site (WHS). The vision and strategy for the future of the WHS comes from the *City of Bath World Heritage Site Management Plan 2010-2016* prepared by a partnership body (the WHS Steering Group) and published by Bath & North East Somerset Council. This describes the WHS and explains its significance, sets objectives, reviews the issues it faces, and sets out a substantial action plan for implementation. The Council also employs a World Heritage Manager to promote this.

Protection for the WHS in planning policy is provided nationally principally by the National Planning Policy Framework (NPPF). This requires that great weight should be given to conservation, and aims to ensure that 'substantial harm' to a WHS "should be wholly exceptional" (paragraph 132). Development involving 'less than substantial harm' "should be weighed against the public benefits of the proposal, including securing its optimum viable use" (paragraph 134). As well as the level of harm, consideration should be given to the relative significance of the heritage asset affected (paragraph 138). This policy has been effective so far in Bath insofar as inappropriate sites for housing have not been released within the WHS area even though the Council had a shortage of land against the 'five year's land supply' policy in the NPPF prior to the recent adoption of its Core Strategy. Acceptable sites have been released for housing instead either within the city or elsewhere in the Council's area.

The statement of Outstanding Universal Value omits many features in Bath which are of national or local importance, especially the Victorian contributions including the railway and canal. Proposals affecting such features are therefore addressed for their wider effect on the WHS, but are otherwise decided according to other planning policies. Separate designations in law or policy overlie the WHS designation, addressing a range of different issues which are nonetheless relevant to the WHS. These include:

– nearly 5,000 listed buildings (from all periods) of architectural or historic importance;
– a Conservation Area covering two thirds of Bath, recognising its 'whole place' value;
– the Bath & Bristol Green Belt surrounding Bath on all sides, to contain urban sprawl;
– the Cotswolds Area of Outstanding Natural Beauty, surrounding the city on its north, east and south sides, in recognition of its landscape quality; and
– 9 entries in English Heritage's list of Registered Historic Parks and Gardens.

Each designation has its own policy in planning practice, and it is implementation of these policies which for the most part achieves the intended protection of the WHS. Local planning policy does include a policy to prevent harm to the qualities of the WHS or its setting, and this has been used 430 times as a reason for refusing planning applications since the policy was adopted in October 1987. However, it does not appear to have been used alone, without reasons for refusal which apply other policies at the same time. The power of a WHS planning policy by itself has therefore not been tested in Bath, though there have been no decisions by Inspectors or the Secretary of State to allow appeals where the WHS was included in grounds for the Council's refusal of permission. Of some surprise was the decision in 2008 not to call-in the Western Riverside proposed development (see below): that was held to be not of national significance or sufficiently controversial, despite prompting a visit to Bath by a UNESCO delegation.

The development challenge

There is a constant challenge to balance the conservation of historic, cultural and natural assets of global significance with the needs of an entire living city. On a day-to-day basis, most of the development pressures facing the WHS are for small-scale change. At the same time, there is wide recognition that incremental modest change can seriously erode the quality of the Georgian fabric and the public realm, and so must be strictly controlled both by decisions on planning applications and by effective enforcement action against unauthorised developments. The risk to this aspect of the heritage derives mainly from changes by the Government affecting planning control. First, cutbacks in funding for staff have reduced the number of specialist Conservation Officers in Bath, with the scale of enforcement activity also being at risk. This directly affects the staff time available for finding the best solutions for Bath's heritage. Second, legislation has been relaxed on development which may lawfully be carried out without any express permission at all from the local planning authority ('permitted development rights'), so more smaller-scale projects, including conversion of offices to homes, can now proceed in any event. The prospect of further relaxation has been announced in the 2013 Budget.

The main decisions about the scale of development which should take place, where it should go and its form are taken through the forward planning system. The Bath and North East Somerset Local Plan adopted in October 2007, has been the development plan for Bath until it was recently replaced by a new type of plan under the Planning and Compulsory Purchase Act 2004: the Bath and North East Somerset Core Strategy. This new plan had taken longer than any other plan in England to be approved following the date of its submission for Examination, in part reflecting the difficulty of reconciling Bath's growth with its WHS status. Bath is a compact city with relatively small areas of suburban development and has limited options available for development without conflict with other established policies.

Virtually no change is expected within the Georgian core. Elsewhere, Bath is fortunate to have available at present some significant opportunities for accommodating growth within its boundaries, despite its global heritage significance. This comprises principally a former industrial area known as the Western Riverside, which has been vacated by industry, and sites within the suburbs of the city being made available by the Ministry of Defence. There is also some scope for expansion on the campuses of the University of Bath and potentially at Bath Spa University (which lies outside the WHS but within its setting). The local authority is growth focused but still proud of its WHS status. Heritage is not seen as an obstacle to growth but as an incentive for high quality, contemporary development that reflects today's needs. As a result, the Council has proposed to build about 7,000 new homes at Bath between 2011 and 2029. This would give Bath a significant proportion of the Council area's growth without any reduction for heritage purposes. More intensive use of urban land is expected, outside the Georgian core, so that an additional 1,150 dwellings can be built there to contribute to the 7,000 required.

Change in the setting of Bath

The only previous spilling-over of development beyond the hills encircling Bath was some years ago at Twerton. This would almost certainly not be allowed now, but was a decision of its time. Pressures remain for peripheral expansion, but the combined designations of World Heritage Site, Green Belt and (for three quarters of the edge) Area of Outstanding Natural Beauty (AONB) have dampened expectations considerably. Development pressures have instead largely leapfrogged the Green Belt to settlements such as Peasedown St John to the south west.

The emerging Bath & North East Somerset Core Strategy has examined at length the options for development on Bath's fringes. Since November 2013, the proposals have included release of land for 300 dwellings at Odd Down (to the south of Bath) and 150 dwellings at Weston (to the north-west). These 450 dwellings represent just 6% of the city's commitment to housing land supply, a far smaller fraction than on the periphery of most large historic towns. Nonetheless, these sites are fiercely contested. Odd Down is on a plateau site abutting the WHS and on the edge of fine countryside to the south, while development at Weston would continue housing development a little further up already developed hillside. Both sites are in the Green Belt and AONB. The Inspector Examining the Core Strategy ruled that development should proceed at Odd Down but not at Weston, principally because the impact of development proposed at Weston on both the WHS setting and the Cotswolds AONB did not outweigh the benefit of development of this scale.

Looking south from beside Lansdown Lane: part of the Weston site proposed by the Council for release for housing lies beyond the first hedgerow

Previous pressures for release of land for urban development may return in future. The Duchy of Cornwall has twice proposed the release of land for an urban extension at Newton St. Loe, beside the A4 trunk road to Bristol on the west side of Bath, while in 2005 the draft Regional Spatial Strategy for the South West considered a major urban extension on the south-west side of Bath (i.e. the one quarter not designated as AONB, including Newton St. Loe). Technical evaluations concluded that the whole area had low capacity to absorb development. The implication is the City of Bath is already struggling to accommodate

significant further development on greenfield sites without serious breaches of policy constraints, and that the potential for urban land recycling away from the Georgian core will depend on sites unexpectedly becoming available. After the current round of development, that may well not be on the scale needed to meet the future needs of the city's population.

With this in mind, and to provide evidence to support the emerging Core Strategy, the local authority commissioned a Supplementary Planning Document (SPD) *City of Bath World Heritage Site Setting*. This was initially prompted by the Regional Spatial Strategy proposals in 2005 and was published after considerable research and effort in August 2013. It contains a wealth of information describing the setting and where it is, what is important about this, and how impacts affecting the setting should be addressed. It provides extensive information on aspects of the significance of the WHS, including landscape and townscape character, views, historical significance and historical associations, all of which should be taken in to account when considering the impacts of development proposals in or affecting the setting of the built-up area. The SPD specifies a process for assessing the overall significance of the effects of proposed development or other change on the WHS (combining an assessment of sensitivity and the magnitude of the effects), addressing the WHS's Outstanding Universal Value, authenticity, integrity and significance. In this way, the 'setting' of the WHS is not defined on a map but is guided by any change proposed. The SPD process is thereby an alternative to delineating on a map a buffer zone around the WHS (the more usual approach encouraged by UNESCO). The Inspector at the Core Strategy Examination endorsed the WHS Setting SPD approach and placed substantial weight on its methodology, information and conclusions. The value of this resource for informing decisions of all kinds in and around the city is plain to see, especially as it is a statutory planning document.

<u>The missing policies</u>

The heavy branding of Bath as a World Heritage Site gives the city a certain caché. This is supported by the Council, the business community and the conservation sector. Nonetheless, some potential conflicts between growth and conservation remain unresolved. Within the city a key omission is a Conservation Area Appraisal, which would complement the Setting SPD. This would provide characterisation and identify qualities (including views out) which would in turn assist development management and provide better explanation of small-scale issues to businesses and others in the central area. On the one hand the omission is surprising in view of the outstanding importance of the area internationally. On the other hand, the amount of work that would be involved in preparing it, especially in a period of serious cutbacks in staff, makes this understandable.

The section of the NPPF on conserving and enhancing the historic environment focuses on the appropriate sympathetic treatment of 'heritage assets', clearly extending the scope of what should be valued beyond that which is statutorily listed or designated to other structures and features. Many local authorities have been prompted in response to prepare a 'local list' of heritage assets, but there is no such list in Bath. With the vast number of listed buildings in the city already, the Council has some reluctance to focus on others which are unlisted, perhaps fearing that this would impede growth and adaptation. The issue was thrown into sharp relief when a proposal to demolish an unlisted building near the bus

station gathered a petition of 11,000 opponents. However, unlisted buildings are an important contribution to the overall quality of the city, not only in the Conservation Area, and the considered management of this resource could contribute to the ongoing maintenance of the quality of the WHS.

The case for preparing a strategy on tall buildings has arisen notably at the Western Riverside site, where there was controversy over buildings planned for 8-9 storeys in high density development. A UNESCO delegation to Bath in 2008 had identified 'aggressive development' as a risk to address, partly as result of this proposal, and in response to this the Council commissioned a report *Bath Building Heights Strategy* (Urban Initiatives, September 2010, Bath & NE Somerset Council). The WHS Management Plan reports that this study of tall buildings in Bath was intended to be taken forward as a Supplementary Planning Document "to ensure that it becomes a practical planning tool" (paragraph 5.2.22). However, the completed study was not adopted in this way. It still provides useful evidence to inform determination of planning applications and the allocation of development sites within the city, and it will help establish design principles in the Council's forthcoming Placemaking Plan (part of the new style Local Plan) currently being prepared. The problem remains that there will be insufficient formal policy context on the next occasion a tall building is proposed. The associated issue of urban design for new developments would also benefit from city-wide attention instead of a case-by-case approach, and the Placemaking Plan will address this.

Finally, the Council has not got to grips with its approach to contemporary architecture in the World Heritage Site. There have been significant contemporary developments which were controversial at the time of decision but have now largely been accepted, such as the Thermae Bath Spa and the rear extension to the Holborne Museum. However, such cases retain the ability to generate enormous public interest, and a framework for addressing these could be valuable. The Council already has in place an Urban Regeneration Panel which studies the design of larger schemes, offering one means of taking this forward.

<u>Outcomes</u>

Bath and North East Somerset Council is a supporter of economic growth both as an authority and as major landowner in the city, while the Bath Preservation Trust leads a formidable array of conservation bodies in the city. This could be a recipe for a war of attrition between development and heritage, but the World Heritage Site provides a focus around which the parties can largely agree. All parties increasingly understand how the Outstanding Universal Value of the city plays out in relation to development proposals, and the WHS Management Plan explains the approach that is needed. With UNESCO taking a keen interest in how one of its few global city-scale Sites fares, there is a feeling of local shared responsibility for heritage often lacking elsewhere. All this has been a valuable context for managing growth.

There is some consensus that the WHS designation has achieved two significant benefits. First, by taking a 'whole city' approach, the Council has been able to insist on high quality design standards and a consistent approach to materials everywhere in the city and not just in the historic core. Attention has been paid to landscape setting and containment at the

whole city scale. Second, but for the designation, there would probably have been discernibly greater development on the urban edge of Bath, and perhaps more assertive development in the centre.

Specific outcomes can rarely be tied to the WHS designation, mainly because it is supported by no legislation of its own and its purposes are given effect largely through the planning system. The physical intentions have largely been achieved to date, but it has been the more familiar mechanisms of Listed Buildings, Conservation Area, Scheduled Ancient Monuments, Green Belt and Area of Outstanding Natural Beauty that have delivered the main results. For example, not a single listed building has been lost in recent years. There is however some fear that purely policy-based mechanisms without the backing of statute could be set aside in a moment of political trauma, losing World Heritage Sites completely (by the UK withdrawing from the World Heritage Convention), or eroding Green Belts (for which there is already some evidence in development plans around England).

Bath has been fortunate to have available sufficient brownfield sites for redevelopment to meet the bulk of its development obligations in the current round of forward planning. This may not recur, so the options for development in future will need revisiting. There has already been some use of the safety-valve of development beyond the Green Belt instead of within Bath to meet housing land obligations. Another possibility, not yet deployed, is to invite neighbouring authorities – notably Wiltshire Council – to accommodate more development to meet Bath's needs. If development pressure builds within the city, there is scope for conservation interests to purchase key sites to keep them green, but that cannot be a strategy everywhere for responding to the pressures of growth.

Lessons learnt

World Heritage Site inscription has posed the question across Bath 'what does this designation mean for us'. The responses have generated some cohesiveness of purpose to which different interest groups can subscribe, particularly on a whole city approach to landscape setting and design standards while accepting a significant rate of growth. The Management Plan was not controversial, even on its approach to reconciling growth with heritage, probably as a result of being a partnership effort. This could provide inspiration to other authorities looking for city-wide coherence of purpose, even in the absence of a WHS designation.

The World Heritage Site has been a label of quality for the City of Bath. Bath continues to perform very well economically. Designation has been instrumental in persuading doubtful councillors and other opinion-leaders that protecting heritage is good for business rather than a cost burden which drains away developer interest. This should inspire more heritage-led regeneration.

High quality design is now widely recognised in Bath as an important component of change, sustaining the quality of the whole city and offering more of a benefit than a cost. Other historic towns and cities should be able to take the same approach, as this is not dependent on World Heritage Site designation. Rather it is in line with Government policy in the National Planning Policy Framework.

Overall the World Heritage Site designation has been a real benefit to Bath and successfully used in a number of ways, but the journey is not yet complete. Difficult issues such as policy approaches to tall buildings, unlisted structures, design coding and contemporary buildings have been found politically awkward to resolve. The lesson that heritage does not look after itself has been learnt only slowly in Bath, and there remain real constraints caused by cutbacks to numbers of qualified Conservation Officers. This is further putting off attention to issues like Conservation Area Appraisal, and there remains a sense that the edifice is fragile.

APPENDIX 4

CAMBRIDGE CASE STUDY

Special qualities

Cambridge has over 120,000 residents and is growing rapidly. Its status is finely adjusting from a market town with a world-renowned University to a city at the heart of a booming technology and science research sector on the edge of the East Anglian fens. Part of its success is attributable to the enduring quality of its outstanding historic core based on the Colleges and the city's remarkably green surroundings, which attract businesses, residents, students and tourists. Sir William Holford and Myles Wright in their *Cambridge Planning Proposals* in 1950 described Cambridge in terms as relevant today as "one of the most pleasant places on earth in which to live... The Cambridge tradition is cherished by the present inhabitants, not merely as something to be preserved but to be continued. Planners who suggest improvements must therefore be certain either that change is inevitable or that clear advantage is to be gained from it".

Rus in urbe: King's College from the Backs on a summer evening. "Even the cows in the meadow opposite seem arranged by some rustic fine-art commission", Simon Jenkins, *England's 100 best views*, 2013.

Cambridge City Council's Conservation Area Appraisal *Cambridge Historic Core Appraisal* 2006 describes the city as having a 'split personality'. "It has a very marked distinction between the vernacular buildings of an East Anglian market town and the grand buildings of the University and its Colleges, the construction of which has erased most traces of Cambridge's industrial beginnings. The absence of any significant surviving industrial buildings is therefore a key aspect of central Cambridge; instead, the major landmarks tend

to be the churches and College gatehouses." The historic core contains over 1,000 listed buildings of which 61 are Grade I, and 8 of the Colleges have Registered Parks and Gardens. Most of Cambridge is flat, so tall buildings can aid orientation. The only ground level panorama over the central area is from Castle Hill to the north. The setting of Cambridge can be enjoyed from the River Cam as the principal green corridor running through the city, while other major public open spaces bring green fingers into the heart of the City and provide a green environment. Further out the surrounding countryside in places offers views to the city's historic skyline, particularly from the west, and Cambridge is one of a small number of historic cities nationally for which a Green Belt has been designated primarily in recognition of its historic significance, to control the outward sprawl of the city.

Growth in the Cambridge subregion

The boundary of the administrative area of Cambridge City Council is drawn quite tightly around the city, while the inner Green Belt boundary mostly follows the urban edge. The options for absorbing Cambridge's development requirements within its own boundaries are therefore limited. The city is also the place of work and services for large numbers of residents of the surrounding areas, principally within South Cambridgeshire District, which encircles the City, but also from further afield such as the market towns of Ely (East Cambridgeshire), Huntingdon, St Ives and St Neots (all Huntingdonshire), Newmarket (Forest Heath), Haverhill (St Edmundsbury) and Royston (North Hertfordshire). These areas all have a stake in the future of Cambridge, and Cambridgeshire County Council is responsible for transport planning to make commuting and access practicable. An innovative Guided Busway opened in 2011 largely along the line of the former Huntingdon – Cambridge railway to the north-west of the city, followed by a route from the railway station to Trumpington on the southern edge of the city.

Guided Busway in use near Longstanton

Planning for the growth of Cambridge has long been a strongly co-operative effort between the authorities concerned. Cambridge City Council and South Cambridgeshire District Council particularly have worked closely together on a variety of planning matters over many years reflecting the close functional relationship between the tightly drawn city boundary and its rural surroundings. This includes officer and member-level co-operation on the preparation of Structure Plans, Regional Plans, existing development plans and joint Area Action Plans. Countywide co-operation includes the Joint Strategic Transport and Spatial Planning Group which was set up to oversee the preparation of new Local Plans and a Transport Strategy for the Greater Cambridge area. The local authorities in Cambridgeshire have agreed a strategic planning approach to the area, with joint position statements in 2010 and 2012 setting out the development strategy for Cambridgeshire to

follow the abolition of Regional Spatial Strategies. In spring 2013 Peterborough City Council and all the local authorities in Cambridgeshire signed a *Cambridgeshire & Peterborough Memorandum of Co-operation Supporting the Spatial Approach 2011-2031* to support the development of a coherent and comprehensive growth strategy across Cambridgeshire and Peterborough, and feed into the current review of development plans. This set out an agreed order of priorities in which development requirements in the Cambridge subregion would be satisfied:

- Within the built up area of Cambridge;
- On the edge of Cambridge;
- One or more new settlements;
- Within or adjoining market towns; and
- At sustainable villages.

The order of development priorities has changed significantly over the last fifteen years. Development in Cambridge had previously been constrained by the Green Belt. One of the effects of this was that housing development which would have taken place in Cambridge was dispersed to towns and villages beyond the outer boundary of the Green Belt such as the larger villages of Papworth and Longstanton in South Cambridgeshire. People commuted back to jobs in Cambridge contributing to congestion, greenhouse gas emissions, air quality problems and other quality of life issues, while housing affordability problems persisted in Cambridge. The strategy introduced in the 2003 Cambridgeshire Structure Plan recognised that a significant change in the approach to the planning of the city was required in order to redress the imbalance between homes and jobs in, and close to, Cambridge. It also needed to provide for the long-term growth of the University of Cambridge and Addenbrooke's Hospital, whilst minimising increases in congestion on radial routes into the city. Large land releases from the Green Belt to facilitate development on the urban edge were made through the Cambridge Local Plan in 2006 and the South Cambridgeshire Core Strategy adopted in 2007, following Green Belt reviews in 2002 by both authorities. A new town called Northstowe was also agreed between Longstanton and Oakington, north-west of Cambridge adjacent to the (then-planned) Guided Busway. The current reviews of plans in both authorities continue the current principles.

The principal effect in South Cambridgeshire was to switch effort from expanding its larger villages to planning for new settlements. Within Cambridge's city boundary, the impact was to demand substantially more development to take place, coinciding with the rapid growth supporting 'the Cambridge Phenomenon'. Both authorities wanted to retain the inherent attractiveness of Cambridge which underlies its success, embedding the historic environment within policy. As the City Council's Local Plan proposed submission in 2013 puts it: "The vision for Cambridge is of a compact, dynamic city, located within the high quality landscape setting of the Cambridge Green Belt. The city will draw inspiration from its iconic historic core, heritage assets and structural green corridors, achieving a sense of place in all its parts, with generous, accessible and biodiverse open spaces and well-designed architecture….". The competing requirements inevitably gave rise to difficult decisions about the location of development, its format and the effects of Green Belt land release on the city's setting and compact feel. This case study concentrates on the aspects of urban land recycling in Cambridge and new settlements in South Cambridgeshire.

Like most authorities in England, Cambridge City Council and South Cambridgeshire District Council have found that their planning processes are driven particularly by making provision for sufficient housing supply, doing so in a way which satisfies heavily revised national policy set out in the National Planning Policy Framework published in March 2012. Provision is expected to be made to meet 'objectively assessed housing need', which has been calculated as about 14,000 additional homes in Cambridge and about 19,000 in South Cambridgeshire during the twenty year period 2011-2031. In Cambridge this scale of growth implies an overall rate of building at 700pa compared with the average of little more than 450pa achieved 2001-2011. Each authority is committed to supplying the land needed to meet the housing requirements within its own area. This is a challenge in the City Council area due to the tightly drawn administrative boundary, the Green Belt and the constraints of the historic environment. Land must of course also be supplied for economic development, schools and a wide range of other purposes at the same time. In March Cambridge City Council and South Cambridgeshire DC submitted Local Plan reviews for examination in parallel, with close agreement between them on the scales, locations and priorities for new development.

Urban intensification

Cambridge City Council has proposed in its emerging Local Plan to build about 6,600 dwellings within the urban area 2011-31. This includes development on four small Green Belt sites (distinct from all urban extensions). This is clearly urban intensification on a serious scale: the 2011 Census dwelling stock figure for the Council area was about 48,300, indicating a growth of nearly 14% in 20 years within the built-up area. Nonetheless, the policy approach of the City Council is striking in that it does not advocate higher density development for any type of use, and the Plan rarely refers to 'intensification'. Instead, in each 'Area Of Major Change' and 'Opportunity Area' available for redevelopment within the city "The purpose is to ensure that each area can be designed with the principles of sustainable development in mind, with appropriate densities of development, and supporting mixed uses and activity appropriate to the scale of development" (paragraph 3.24). With affordable housing too, Policy 45 is clear that "The required density on a given site will need to have regard to its wider context and other policies of this plan." Higher densities may well be achieved, but this is a consequence of what a site can accommodate, not an objective. This approach immediately reduces the potential challenge to heritage interests on any redevelopment site.

Aberdeen Avenue on the multi-award winning Accordia development on the former site of government offices, begun 2003: 40 dwellings per hectare in a range of sizes with c.105 bedspaces/ha and 30% affordable homes.

At the same time, the heritage chapter of the City Council's emerging Local Plan begins with three policies on 'responding to context', 'creating successful places' and 'designing new buildings' (continuing the approach in the Local Plan of 2006). This is a policy approach in which heritage protection will continue to be achieved by starting from a position of expecting change to happen and ensuring that this is good, rather than simply by specifying a list of changes that will not be acceptable. Policies on 'Conservation and enhancement of Cambridge's historic environment' and on other relevant issues support this. This approach requires developers to supply comprehensive information and explanation, and to review development opportunities with sensitivity, in which context is key. In the right place, large developments can be permitted provided they are judged to be in suitable form and done well. Issues like scale, public realm, open space, massing, layouts and materials are central to this. The City Council operates a thorough pre-application review process with agents and developers to clarify what is required. High quality design is strongly supported by councillors, who are also advised by an independent Conservation and Design Panel, and heritage protection has been successfully upheld at the few appeals against refusals.

Outside the historic core, some parts of Cambridge are being transformed by land recycling. The largest and most urban scheme is around the railway station, where the 'CB1' development is producing 331 residential units, 1,250 student units, over 50,000m^2 each of office and retail space, two hotels, multi-storey cycle park and a range of associated facilities. This will see major new interventions on the Cambridge skyline.

Apartment blocks in the CB1 development near the railway station, with the gardens too almost complete.

Redevelopment is also progressing around Newmarket Road to the east of Cambridge. This is an area that suffered from previous highways schemes and erosion of the public realm. Redevelopment provides the opportunity to correct this while introducing larger scale development than the warehouses and modest commercial properties which have grown along it in the last 40 years. The Eastern Gate Development Framework is a Supplementary Planning Document which closely shapes the changes needed, identifying heights and mixes of development, new pedestrian priorities and a greener environment. Numerous other areas are also undergoing renewal or are planned to do so.

Hoarding on Station Road outlining the CB1 scheme, outside the No. 50 redevelopment site.

Stages of redevelopment on Newmarket Road. From right to left: a commercial site ripe for redevelopment; a former warehouse site with residential use approved undergoing archaeological investigation; and a new hotel set back from the road allowing the introduction of street trees.

The sites allocated for development in the emerging Local Plan were chosen after a comprehensive review of sites (for housing through the Strategic Housing Land Availability Assessment). This included the possibility of development within the historic core, though there is little scope for this given the nature of the area and the inevitable constraints. Nonetheless, one major block of property owned by the University around Mill Lane has considerable scope for re-use, conversions and redevelopment, in a prime location overlooking the Mill Pit just yards from Queens College and St Catharine's College. The Old Press/Mill Lane Supplementary Planning Document was approved by the Council in January 2010 to establish a clear vision and appropriate context for the sensitive enhancement of

the whole area. Redevelopment will need to safeguard the architectural, historic, cultural and archaeological importance of the area.

Taking a punt? The cream-painted former library overlooking the Mill Pit and the yellow-brick club building behind it are available for demolition; this area around Mill Lane can take advantage of its setting on the river frontage within the city centre.

The City Council has paid particular attention to protecting the skyline of Cambridge. This is critical to the character of the city seen from close range and from its wider setting. The Council had a policy on view cones in its 1996 Local Plan, while the current 2006 Local Plan has a tall buildings policy that "New buildings which are significantly taller than their neighbours and/or roof-top plant or other features on existing buildings, will only be permitted if it can be demonstrated that they will not detract from [a range of interests]". A Supplementary Planning Document explains in detail how current policy is applied. This is reinforced in the emerging Local Plan so that there would be special attention to (though not an outright ban on) developments over 19m high within the historic core and 13m outside it, reflecting the general height of surrounding properties. Taller buildings are steered to suitable sites, usually to terminate key vistas, but will only be permitted when justified and found not to harm the character or appearance of the city. A tall hotel allowed on Thompson Lane near Magdalene Bridge within the historic core (on its north side) was particularly controversial.

The City Council also operates an active list of Buildings of Local Interest, with public support. An existing policy in the 2006 Local Plan has been updated in the emerging Local Plan so that there will be a 'presumption in favour' of their retention. The Council considers this does protection not impede its support for urban land recycling.

More than 13 metres high – landmark buildings on Hills Road, the access route into Cambridge from the south:
Above left: Botanic House (junction with Station Road) – 8 floors
Above: The Marque (junction with Cherry Hinton Road) – 10 floors
Left: The Belvedere, Homerton, opposite The Marque – 10 floors (note also the start of the southern section of Guided Busway to Trumpington, beside the railway)

There is continual pressure for development challenging the heritage of the historic core, from the University and Colleges as well as private developers. For example, a proposal for 97 graduate student rooms on University land at Mill Lane in February 2014 was withdrawn after a City Council officers' report recommended refusal for over-development. This would have added up to two storeys to an existing Building of Local Interest, with adverse impacts on listed buildings and the conservation area, contrary to three policies. Matching existing materials could be difficult and the internal treatment was not characteristic of the building. There would be privacy concerns in some rooms, while in others inadequate lighting would cause a poor living environment for the occupants and one room had no windows at all.

<u>New settlements</u>

South Cambridgeshire faces a problem in how best to contribute to the subregional needs of Cambridge. The District has no large town (Sawston has little more than 7,000 people) and there is resistance to the substantial growth of numerous existing villages. Residents of South Cambridgeshire have high levels of satisfaction with their quality of life which they are keen to retain, even though growth of the villages would support improved services, especially retailing and bus services, which would make them more sustainable. The option of new settlements provides the opportunity to concentrate the provision of services. It has also been tried before in the district at both Bar Hill begun in 1967 and Cambourne begun in 1998. These new settlements have generally been welcomed by the residents moving in, and new settlements are now the preferred approach for accommodating large scale housing development. The change in priorities within Cambridgeshire was described above, and this was expressed through the confirmation of the Northstowe new town in the District's 2007 Core Strategy.

Bar Hill

Bar Hill is a new village built between 1967 and 1989 adjacent to the Huntingdon Road (A14) about 4 miles north-west of Cambridge just beyond the Cambridge Green Belt. It has nearly 2,000 dwellings and a population of 4,000 (down from over 5,000 on completion). It was planned in the late 1950s to alleviate the housing shortage in south Cambridgeshire. The village has a range of employers and a hotel, but its parade of shops has gone as a large Tesco now dominates its retail offer. Facilities include pub, library, post office, health centre, church, primary school, village hall and social club. There is an active local community with numerous societies.

Bar Hill village from Hillcrest

Bar Hill village centre

The relationship between building new settlements in South Cambridgeshire and protecting the historic core of Cambridge is indirect. The scope for outward expansion of Cambridge will become progressively limited, with the airport on the east of the city identified as the last remaining opportunity without seriously damaging the purposes for which the Green Belt was established and in turn the heritage of Cambridge. The City Council recognises in its emerging Local Plan that substantial edge of city land releases have their limits:

> "Removing large sites from the Cambridge Green Belt could irreversibly and adversely impact on the special character of Cambridge…. The detrimental impacts of further large-scale major development on the edge of Cambridge were demonstrated in the Inner Green Belt Study Review 2012" (paragraph 2.29).
>
> "The conclusion of the consideration of reasonable site options for development on the edge of Cambridge is to require development away from the edge of Cambridge to meet the remaining development needs of the wider Cambridge area. The sustainability appraisal of broad locations…. demonstrates clearly that new settlements are the next most sustainable location for growth…." (paragraph 2.30).

New settlements therefore appear increasingly likely to be the preferred mechanism for accommodating Cambridge's further development in future rounds of strategic planning.

Cambourne

The cricket field at the centre of Lower Cambourne

Cambourne is a new village of 4,250 dwellings built since 1998 and nearing completion about 8 miles west of Cambridge immediately south of the A428. The main village centre is in Great Cambourne, which has a large Morrisons supermarket and a range of other shops, a pub, hotel and the principal social facilities. Lower Cambourne is to the west and Upper Cambourne, still under construction, is to the east. Dwellings have been built primarily by volume house builders (George Wimpey and Taylor Woodrow, Bryant Homes and Bovis Homes), including 30% affordable housing. Higher densities in Upper Cambourne give this village a very different personality from the early housing. A substantial business park is located on the north-west side of the village, with the offices of South Cambridgeshire District Council built adjacent in 2004. A fourth linked village, Cambourne West, is proposed to be developed with about 1,200 houses over the period 2016-2026. There is a thriving community with numerous sports activities and 40 clubs and societies. The specially created Parish Council Is very active, employing staff, funding additional facilities, installing extensive PV panels on roofs of major buildings, and even advising other Parishes in the District. There is access to Cambridge by bus every 20 minutes, to St Neots half-hourly and less frequently to other destinations.

Supermarket at the hub of Great Cambourne village

Cambourne Business Park

Development in progress at Upper Cambourne seen from Broadway, the eastern edge of the new village

The large number of dwellings expected to be supplied in South Cambridgeshire in 2011-31 has prompted the District Council to identify two further airfield sites for development, at Bourn Airfield (now largely farmland) and Waterbeach (where a barracks is being vacated).

Northstowe

Northstowe is a new town of up to 10,000 dwellings to be built on and around the site of the disused Oakington Barracks and former RAF airfield about 4 miles north-west of the edge of Cambridge. The settlement is just outside the Cambridge Green Belt and will be kept separate from the adjacent villages of Longstanton and Oakington. The Cambridgeshire Guided Busway (CGB) defines a curved edge to the northern and eastern side of the town. The Longstanton Park-and-Ride and a stop at Oakington are adjacent to the town, while a dedicated busway aligned through the new settlement will link to CGB, giving rapid access to Cambridge (and to St Ives and Huntingdon).

Former Oakington Barracks on the Northstowe site

Northstowe was first proposed as a location for a new town in 1998, as part of the work to inform the 2003 Cambridgeshire Structure Plan. South Cambridgeshire's Area Action Plan for the town was approved in 2007, but commencement on site was delayed by the recession. Development is expected to begin in summer 2014 following the recovery of the housing market and a £1.5bn Government commitment to upgrading the nearby A14 by 2019. The lead developer is Gallagher, working with the Homes and Community Agency (the Government's national housing and regeneration delivery agency and successor body to English Partnerships who acquired the former military elements of the site in 2006). There is an emphasis on energy and water efficiency, with priority to early provision of transport, secondary education and other infrastructure. Nearly 6,000 dwellings are expected to be built by 2031 of which 20% will be affordable. A strategically important employment area is intended, allowing for continued growth of the high technology research and development sector.

Bourn Airfield

Bourn Airfield is about 6 miles west of the edge of Cambridge. It is adjacent to the east side of Cambourne and west of the small villages of Highfields and Caldecote, south of the A428. This RAF station was closed in 1948 and the disused airfield sold for farmland in 1961. The site lies just beyond the outer boundary of the Cambridge Green Belt. The new off-line dual carriageway serving Cambourne would also provide good access to Cambridge for the new village at Bourn Airfield, with buses providing the main public transport. The village is conceived as free-standing, but is expected to include a segregated bus link through the development to Cambourne and might share higher level facilities such its secondary school with Cambourne. The proposal here is for 3,500 dwellings with development beginning in 2022 and achieving 1,700 homes by 2031. This is thus a long term scheme where the main policy proposals will need to be developed in an Area Action Plan.

A market being held on Bourn Airfield, seen from Broadway, the road separating the site from Cambourne

Waterbeach

The proposed Waterbeach new town is located on the edge of the Fens between the A10 (to the west) and Cambridge to Ely railway line (to the east) about 4 miles north-east of the city's edge. Waterbeach village lies immediately to the south and retaining its identity will be assisted by extending the outer boundary of the Cambridge Green Belt. A constraint on development to the north is Denny Abbey (scheduled monument and Grade I listed building), originally established in a remote location and where retaining a sense of its isolated setting remains a key issue. The development site is partly brownfield and partly greenfield. It comprises a disused airfield, a barracks due to be vacated, and farmland. The scheme includes relocating Waterbeach railway station about one kilometre to the north so that it can serve both the existing village and the new town. A Park and Ride site on the A10 is also proposed, to intercept traffic north of Waterbeach, and a segregated busway to link the town to Cambridge. The A10 is at capacity and will also require improvement.

Possible site for a relocated Waterbeach railway station, on the edge of the existing village and serving the proposed new town (in the centre distance beyond the hedgerow trees).

The site is proposed for 8,000-9,000 dwellings and associated development, with comprehensive infrastructure. Housing construction is not currently proposed to begin until 2026 and would achieve only 1,400 homes by 2031. The site is expected to provide employment opportunities and is also conveniently located for the Cambridge Research Park immediately to the west on the opposite side of the A10. Waterbeach is a long term development opportunity. A full range of detailed assessments will be required and an Area Action Plan will be prepared.

Outcomes

The order of priorities for development in the Cambridge subregion, established in development plans in 2006 and 2007, has been largely successful in protecting the buildings and townscape within the historic core of Cambridge. The centre of Cambridge has barely changed since the early 1970s (apart from the construction of the Grand Arcade shopping centre), though the scale of development has affected the historic character of the wider city. There is some evidence of collateral damage from the increasing numbers of people around the city and the associated delivery vehicles, heavy use of the public realm, cycle parking problems and wear of green infrastructure. That follows more from the City Council's enthusiasm for supporting growth in Cambridge, including research companies and the major expansion of the University of Cambridge and Anglia Ruskin University, than it does from the methodologies for locating that growth.

The Council considers that development involving urban intensification in recent years has had no adverse impact on the historic core. That position is not challenged significantly, though the new hotel on Thompson Lane is an exception. The development of Cambourne has been remote from the city and had no direct impact on its built heritage. Given the likely alternative option of further urban expansion at the expense of the Green Belt, that

must count as a benefit for the historic core. The same appears likely for Northstowe. The wholly new settlements proposed at Bourn Airfield and Waterbeach, the additional village at Cambourne, and a decision to incorporate from the beginning some previously reserved additional land at Northstowe all suggest great faith in this methodology. Interested parties wish the new plans to accommodate more (or fewer) urban extensions (and the release of more or less Green Belt to match), but the development sequence and therefore the methodologies of urban intensification and new settlement construction are broadly supported.

Lessons learnt

The co-operation between Cambridge City Council and South Cambridgeshire District Council has been integral to the success of planning for the growth of Cambridge. That this has occurred over a lengthy period and overcome different political balances in the two authorities is impressive. The shared wider interest in the success of the historic city and in resolving its growth needs and problems is a critical lesson that should be widely appreciated.

Places need to be proud of their heritage. A high quality historic environment is an economic generator, and spending money to maintain it is an investment not a drag on the economy. Enhancement should make a place more resilience to pressures for adverse change. Heritage assets should be planned into developments from the outset, not treated as a problem. Visualisation techniques aid understanding of what is proposed and assist dialogue.

Heritage and urban design teams need proper resourcing. The sums involved are very small in relation to the scale of the investment being made in development. Even small cuts to small teams can have a significant impact on the scope of what can be tackled and are a false economy. Expertise is part of this equation: although staff inevitably retire, there is a real benefit in retaining expertise, in passing on collective knowledge, and in funding posts to attract high quality staff (who can afford to live in relatively expensive locations such as Cambridge). Staff resources should be sufficient so that heritage research and evaluation work can so far as practicable be undertaken in-house: outside consultants may have insufficient local knowledge or be unfamiliar with the perspective of the commissioning Council.

There should be an emphasis on quality in new development supported throughout the Council and consistently applied across the whole authority. In the case of Cambridge, the City Council has supported a *Quality Charter for Growth* prepared independently for the subregion, and has brought in independent advisory expertise with its Design and Conservation Panel. This has been supplemented by having a positive dialogue and consultation process. With developers and their agents this is at the pre-application stage to clarify what is expected and to ensure that they properly resource the development process. With the voluntary sector bodies concerned with planning and development this has built relations to ensure that good ideas and knowledge can be brought to bear on the often difficult issues.

Urban intensification will work best for heritage where it starts from a perspective of trying to secure the most appropriate scheme for a site, not from a commitment to raise density. The economic pressures are always present to over-develop sites, so good planning policies applied fairly and effectively will always be needed. A consistent emphasis on design quality, supported by the expertise to recognise and require it, will increasingly acquire the respect of all parties and the expectation that this will be essential and therefore provided.

New settlements take a long time to plan and develop, so they offer long term solutions rather than short term fixes. Making them a success and a desirable place to live depends on a clear vision, clear principles, genuine partnership working (between local government, the developers and the community), and interventions to ensure that the market functions in a way which supports the intended evolution of the settlement. There should be high expectations for and insistence on the standards to be achieved (e.g. in design, energy efficiency and affordable housing). A team of people based in the planning authority dedicated to the project is needed to make all this happen.

APPENDIX 5

CHESTER CASE STUDY

Special qualities

Chester, the 'capital' of Cheshire, is a city with an extremely significant history whose fabric encompasses important Roman remains, archaeological deposits, almost wholly intact City Walls, a cathedral and abbey site, the unique Rows (two storey medieval shops) and a wealth of Georgian, Victorian and Edwardian properties. Its location alongside the River Dee historically gave it prominence as a port and its canals link it to Ellesmere Port and the Midlands. The main heritage interests are focussed within the historic core of the walled city and the environs immediately beyond.

A number of routes converge on the city from Liverpool to the north, Manchester to the east, from London and the Midlands to the south and south-east, and from north Wales to the south and west. A combination of dual carriage-ways and motorways form a "ring-road" some distance from the city but cross-city traffic within this ring and on the inner ring road is limited to two river crossings – the Old Dee Bridge and the newer Grosvenor Bridge both on the south and south west sides of the walled city.

The popular public perception of Chester – black and white buildings and shopping streets

The city lies within the expansive Cheshire Plain and hence distant views are restricted. In essence the city is only seen 'upon arrival'. The main issues of relevance to this study therefore relate to the city's character and the impact that development proposals have upon it rather than how the city's visual 'setting' may be affected by growth proposals.

Retaining the special qualities of Chester has in part depended on containing the outward sprawl of the city, a function achieved by the North Cheshire Green Belt which also protects the city's immediate, rural setting. The Chester West and Chester Local Plan submitted in December 2013 for Examination recognises this and confirms that "the Green Belt has assisted in preserving the setting and special character of Chester".

The development challenge

The submitted Local Plan refers to the comparatively low levels of housing completions achieved in the recent past. Proposed development is spread throughout the district with Chester itself to deliver 5,200 new dwellings to 2030. To achieve this land on Wrexham Road will be removed from the Green Belt to provide 1,300 new homes including affordable housing. Within the city centre, key retail and leisure proposals include the comprehensively planned development of the Northgate area of the city for major leisure and retail uses and a new theatre.

Chester Business Park (on Wrexham Road, opposite the area proposed for release as housing land) will remain a key location for existing business and office space. In addition to housing growth, employment development is proposed for Chester. The 'Chester One City Plan', a 15 year strategy to guide economic regeneration in the city, identifies Chester Central Business District as a major regeneration initiative in the north-east of the city adjacent to the railway station.

At the same time as this growth is proceeding, Strategy Policy for Chester 'Strat 3' states that "in recognition of the national and international importance of Chester as a historic walled city, any development within or on the periphery of the city centre or within the urban area should be compatible with the conservation and enhancement of the city centre and the setting of the city."

Planning background

The principal issues to be addressed in accommodating growth pressures in Chester are protection of the city's historic character and the need for high quality design. Both of these topics have been the subject of numerous, extensive and wide-ranging studies dating back over many years. It is abundantly clear is that there is no shortage of evidence identifying the city's character – the bibliography to the *Chester Characterisation Study* by Taylor Young (2012) lists no fewer than 29 reports, masterplans, design guides, development briefs, conservation area appraisals and conservation studies (and there are others).

In 1945, Charles Greenwood the Chester City Engineer and Surveyor in his plan for the redevelopment of Chester stated that "A planning scheme for Chester should aim at preserving the inner area as far as possible in its existing form and character, making such adjustments as may be necessary within its present structure".

Two decades later in 1966, Chester (along with Bath, Chichester and York) was the subject of one of the earliest reports into conservation. These reports were commissioned jointly by the Ministry of Housing and Local Government and the City and County Councils. Richard

Crossland, the then Minister of Housing and Local Government, wrote in the Chester Chronicle at the time of his annoyance that "Exactly the same thing is being plonked down in town after town, the same sort of supermarket beside the cathedral".

The four reports coincided broadly with the Civic Amenities Act 1967 and its requirement on local planning authorities to designate conservation areas. While this was in preparation the Government decided that the studies should be commissioned to examine how conservation policies might be sensibly implemented in these four historic towns. There were two objectives: to produce solutions for specific local problems, and to learn lessons of general application to all our historic towns. However, there was a caveat: “The councils are not committed to adopt any of the recommendations of specifically local application, nor is the Government committed to adopt the various suggestions of more general application.”

Still standing – but possibly not quite reconciled with the inner ring road

One of the stated purposes in Donald Insall’s seminal 1968 report *Chester: a Study in Conservation* was “to discover how to reconcile our old towns with the twentieth century without actually knocking them down”, which has echoes with the issues addressed in this study.

Deans Field – a Scheduled Ancient Monument – is a sub area identified in the characterisation study as a "critical" area, of utmost importance, playing a critical role in the character of Chester overall…

... as is Abbey Street

Design and the public realm

Chester is a fast-changing city under development pressure. Like its predecessors, Cheshire West and Chester Council recognises the importance of the design of new buildings and the design of the wider built environment as central to achieving growth that respects the heritage of the city.

The principal document identifying the character of Chester and providing guidance on the context to which new development should respond is currently the Council-commissioned *Chester Characterisation Study* by Taylor Young (2012). This is an extremely detailed study. It still uses some of the criteria established by Insall in 1968 but advances in information technology and the availability of Geographic Information Systems now enable a greater degree of information to be captured and recorded.

It records the character of the built environment and natural and designed landscape as derived from its heritage and history. It focusses on the central part of the city and its key approaches and identifies 20 areas with the character of each being assessed variously as

Critical - of utmost importance, this sub-area plays a crucial role in the character of Chester overall

Positive - the sub-area contributes positively and is important to the character of the Character Area

Neutral - the sub-area elements within it and is neutral imbalance

Negative - the sub-area detracts from the character of this character area which may indicate a capacity to accommodate change and improve character.

The 20 areas are divided into a total of 140 sub-areas and these in turn are also assessed as critical, positive, neutral or negative.

Key approach routes into the city are also considered as they present important first impressions alongside well used routes. Also almost 300 buildings and structures of townscape merit are identified which are locally important buildings that are unlisted but which contribute significantly to townscape character and should be protected.

The survey methodology assesses each Character Area as Level 1 analysis, all sub-areas have level 2 analysis and the inner sub-areas have a more detailed level 3 analysis.

Level 2 analysis records the following data:
Nature of space, Street enclosure, Boundary treatment, Predominant building height, Predominant building era, Principal land use, Public realm quality, Experience, Buildings and structures of townscape merit, Key detractors, Character assessment

Level 3 analysis records additional data as follows:
Predominant materials, Predominant roofscape, Rhythm, Predominant visible condition, Shop front quality.

For buildings and structures of townscape merit the following data is recorded:
Predominant architectural styles, Building type, Predominant building height, Predominant materials, Predominant roofs cape, Architectural details, Windows, Door opening, Rhythm,

Grounds, Grounds quality, Boundary treatment, Principal land use, Indicative condition, Shop front quality.

This information is presented in detail for each character area. It is available as separate reports and is mapped and recorded so that it can be provided on a study area-wide basis. The maps that accompany the study display clear geographical patterns and show, for example that town centre land uses are surrounded by a circle of residential land and that there is a corridor of leisure use following the river. The dominant eras of development are Georgian and Victorian. Building heights present a mixed picture with generally domestic scale at the edge rising to three and four storey in the retail core.

The most significant outputs are the Character Assessments for each sub-area. Higher value areas can be seen within the City Walls and around The Cross and at the riverside. There are critical and positive sub-areas throughout the Study Area as well as negative areas. It reveals that the positive areas are in need of continuing protection.

The report's key recommendations are that conservation, policy making and development management should consider both buildings and areas. Efforts to conserve and enhance buildings and structures and manage development within their settings should focus on a hierarchy of quality and significance, at the scales of both buildings and areas. Policy making and development management within these areas should be informed by the description of the character of the Character Area and the assessment of each sub-area.

Amongst other relevant evidence on the heritage interest of Chester, design issues and how to apply these to development proposals there is a separate Topic Paper on Chester itself as a background document to the submitted Local Plan. In addition, some older development briefs (such as that for Commonhall Street) are still used as a source of reference. Documents such as the *Chester One City Plan* 2012-2027 and the *Chester Public Realm Design Guide* are not Development Plan Documents but they are material considerations when deciding planning applications.

<u>Has the city's character been preserved by contemporary development?</u>

A recent report produced by Donald Insall Associates in 2010 *Chester One City Plan – A Design Manifesto for Contemporary Design* gets to page 15 of 39 before mentioning design and in doing so highlights that most of the determinants of the city's physical forms do not arise from "overtly aesthetic considerations".

Inevitably judgements about design, its quality and acceptability are often couched in caveats about "subjectivity" and "taste" and it seems that tastes and opinions on what is architecturally acceptable are somewhat transitory notions. The following examples illustrate contrasting opinions on the merits of significant buildings added to Chester's townscape.

Donald Insall's 1968 report *Chester: a Study in Conservation* states that "Exposed aggregate and shutter faced concrete suit Chester's face: coloured glass and plastic panels do not. Restraint is needed to prevent the anarchy of some of the latest commercial and medical

buildings... The new County Police Headquarters is one of the tallest buildings in the city to date, yet by its siting in relation to the Castle and the inner ring road, it marks and distinguishes a formerly weak approach over Grosvenor Bridge and avoids all violence to the City centre. By contrast, the tall and self-righteous block of Commerce House stands as an unrelated dominant in an otherwise low and clinging roof silhouette.... the restrained height and horizontality of the new Market Hall shows how successfully large new buildings can still be introduced into the City's very heart with good manners and integrity". It asserts "that Chester's new shopping precinct (i.e. the Grosvenor Centre) is a brilliant achievement in urban revitalisation... it exploits the 'already indoors' quality that exemplifies so much modern shopfront design [and] achieves this with consummate ease."

Taylor Young's *Chester Characterisation Study* includes Characterisation Area Assessment of Area D – The Castle – noting that "In the 1960's the Police Headquarters were built here in the form of an unloved tower block. This was replaced in 2010 by the new HQ building ... a contemporary city landmark, with a circular plan form".

Taylor Young refers to the replacement of the Victorian Market Hall with "the somewhat brutalist Forum building", assigns it a weak frontage in the townscape and landscape analysis, allocates the bus station as a negative environment with the Crown Plaza hotel as providing negative vistas. It defines the Market Area as a "Key detractor". It describes the Grosvenor Centre as having destroyed significant archaeology (acknowledging that at the time it did not have the protection now afforded to it) and destroyed the "grain" of a large area of the city which would previously have been shaped by ancient burgage plots.

The Crowne Plaza hotel dominating a negative vista

This current assessment of the former Police headquarters, the market hall and the Grosvenor Centre is in complete contrast to the plaudits bestowed upon these

developments around the time of their construction and demonstrates how opinions on contemporary architecture can change over time.

What were once considered to be appropriate responses and materials ..

... are now seen in a different light

Modern design

The current combination of historic characterisation reports, a different approach to conservation and urban design, development briefs and the planning system are helping to deliver an enhanced public realm and higher quality of design.

Redevelopment in the "'Canal Corridor' character area combines contemporary new design, re-use of existing buildings ..

... and modern recreation of traditional building forms

The Old Port Character Area has undergone extensive redevelopment. Its sub-areas are assessed by Taylor Young as Critical, Positive or Neutral with no negative elements.

The Old Port character area where canals and the River Dee meet. Scale and massing reflects traditional forms...

... whilst finding room for "fun architecture" as in this boat shaped scout hut

New apartments address the canal and public realm

Does retention of this decorative facade work in the context of the adjoining new buildings?

This is the area where officers expressed reservations about scale

The scale of the new apartments sits a little unhappily with their neighbours opposite

Some materials and detailing are questionable

Lessons learnt

There are two methodologies that have assisted in preserving the character and setting of Chester. Historically the North Cheshire Green Belt has successfully contained the city limits and ensured that expansion beyond them has been restricted. Growth targets for Chester are to some extent being accommodated in towns and villages beyond the city. This has preserved Chester's setting. Some release of land from the Green Belt is now proposed by the Council to contribute towards the area's substantial housing requirements.

Chester has been the subject of a very large number of studies and reports focussed on its heritage and history. They are detailed, learned documents that provide a wealth of evidence and advice. The latest *Chester Characterisation Study* of 2012 is extremely comprehensive. It utilises the potential of Geographic Information Systems to identify areas and sub-areas and objectively assesses and records numerous layers of information to analyse elements such as Townscape and Landscape, Heritage Assets, Key Detractors and Character Assessments.

In combination the documents provide a sound basis to inform development and redevelopment proposals and against which such schemes can objectively be assessed. The city is well aware of its international significance and seeks to maintain and enhance this eminence. New developments are driven by urban design considerations and this should assist in preserving the city's character.

Whether this is fully delivered through the local and national components of the planning system remains to be seen. It is very much a 'work in progress' and the need to produce a document as wide reaching as the *Chester One City Plan* may be a reflection on the capacity of a Corporate Strategy/Local Plan to deliver what the city aspires to.

In some areas of the city, redevelopment proposals have been extremely successful but elsewhere they still pose questions. In 'boom times' local planning authorities may be able to take a hard line in their negotiations with developers, confident that they will achieve high standards of design and an enhanced public realm. However, in a recession local planning authorities are more likely to accept higher densities and lower standards for fear that the developers will walk away. This suggests that the quality of design achieved can be a function of the prevailing economic climate, even in a high-performing economy such as Chester which is better able to weather a recession than many other places.

The design quality of some developments being permitted in Chester is still dubious. One contributory factor appears to be the loss of experienced, suitably qualified and trained conservation and design staff, even in a city of international significance for its heritage. This reinforces concerns, expressed by numerous organisations, about the ongoing effect of staff cuts on conservation teams.

Finally, growth within the city is being guided by a greater emphasis on urban design than has previously been the case and whilst, inevitably, not all developments and redevelopments meet with universal approval, there are some good examples of new design that ensure that the character of the city is generally being protected. It has been particularly interesting to note that some mid-late twentieth century buildings that had been praised in earlier conservation reports have not stood the test of time and hopefully their replacements will provide opportunities to remedy past mistakes and perceptions.

APPENDIX 6

DURHAM CASE STUDY

Special qualities

Durham is a small city of some 49,000 people in the county of Durham. Its rural hinterland has green fingers that extend in towards the fairly compact city centre which is, of course, dominated by the dramatic structures of the cathedral and castle rising on the cliff-top peninsula above the sweeping curves of the River Wear. The tower of the cathedral is visible several miles away from certain directions providing tantalising glimpses of the drama to come.

The west front of Durham Cathedral on the cliff-top peninsula above the Old Fulling Mill on the River Wear

The historic core of the city comprising the cathedral and castle was inscribed as a World Heritage Site (WHS) in 1986 in recognition of:

- The site's exceptional architecture demonstrating **architectural innovation**;
- The **visual drama** of the Cathedral and Castle on the peninsula and the associations of the site with notions of **romantic beauty**;
- The site's role as a **political statement** as one of Britain's most powerful **symbol**s **of the Norman Conquest**;
- The physical **expression of** the **spiritual and secular power**s of the medieval Prince-Bishops that the defended complex provides;
- The **relics** and material culture of the **three saints** (Cuthbert, Bede and Oswald) buried at the site, and the **cultural and religious traditions** and historical memories associated with them;

- The importance of the site's **archaeological remains**, which are directly related to its history and use over time;
- The **continuity** of use and ownership of the site as a place of religious worship, learning and residence over the past 1000 years.

In combination these meet the following criteria for inscription:

Criterion (iv): "To be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history";

Criterion (ii): "To exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design";

Criterion (vi): "To be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance. (The Committee considers that this criterion should preferably be used in conjunction with other criteria)".

The Durham WHS comprises the Cathedral and Castle and was extended in 2008 to include Palace Green – the space between these two.

The west walls of Durham Castle from Crossgate

The "green" nature of much of the city comprises open farmland as well as sports pitches, allotments, parks, riverside meadows and tree covered cliffs all of which give the city a very distinctive character. The city has been described as sitting in an inner and an outer bowl with views of the cathedral and castle gained from several vantage points. As with many

cities, much of the mid-late 20th century housing development beyond the historic confines is comprised of large and anonymous estates.

Allotments on Margery Lane

Extensive tree cover within the city is an important part of Durham's green character: the station viaduct from the Cathedral

The city can be considered as three areas. The northern suburbs are hemmed in to the west by the A167 road to Chester-le-Street and Newcastle which runs north/south to the west of the city, to the north by a new road (Rotary Way) running east/west from the A167 (which also gives access to a retail park) to the east coast main line, and then by the railway line itself which forms the eastern boundary to this area of the city. An undeveloped "finger" of Green Belt land known as Aykley Heads, through which the railway line runs, lies inside the physical road and railway boundaries.

The eastern suburbs are contained to the north by the A690 Sunderland Road that runs north east away from the city centre roughly following the valley of the River Wear and to the south by roads running east from the city centre. This area is bisected by the A1(M) that runs north/south. The remaining area is a triangular wedge containing the city centre and its western and southern suburbs (which includes the university colleges). This is hemmed in by Green Belt immediately east of the centre around the River Wear and then by South Road running south/west out of the city to join the A167 at the southern tip of the city.

Protecting the Durham World Heritage Site

The land use planning system at national and local level provides the main vehicle to protect the Durham WHS from adverse change. The background to this is set out in the Bath case study. The principal policy statement and evidence base for the WHS in Durham is the *Durham Cathedral and Castle World Heritage Site Management Plan* 2006 prepared by Chris Blandford Associates for the WHS steering group. This plan refers to the early inscription of the WHS at Durham on the UK's first list but that the managerial procedures and structures found at most other UK WHS had not been put in place (i.e. in 20 years) and this in itself was a key issue for the Management Plan. The Management Plan is being reviewed and the boundaries of the WHS may be extended further to include the whole of the peninsula rather than just the buildings and spaces on top. The WHS partnership employs a World Heritage Manager, and at the time of writing there is a vacancy for the post.

These policies are supplemented by planning policies in the Durham City Local Plan adopted in May 2004. Since then, there has been a reorganisation of local government so that Durham City and the other second-tier councils in County have been replaced by a single unitary authority for the whole County of Durham. The Local Plan will therefore be superseded by a new Local Plan for the whole County. This Plan has been submitted for Examination in the summer of 2014. Both the current and the emerging local plans contain policies that refer to the WHS but the emerging plan has a completely different focus to the current plan and this is explored further below.

Heritage protection Durham is provided by a range of other mechanisms. Durham is a compact city with many listed buildings outside the WHS. The Durham City Conservation Area covers a large part of the historic central core beyond the WHS. A Green Belt was put in place around the city comparatively recently in 1999, for a series of reasons including to safeguard the character and special setting of Durham City. In places, the Green Belt is very close to the historic core and proposals are addressed for their wider effect on the WHS. Each designation has its own policy in planning practice, and it is implementation of these policies which for the most part achieves the intended protection of the WHS.

The establishment of a Green Belt around Durham

Green Belts provide one element of the protection of the heritage in other case studies in this report at Lichfield, Bath, Cambridge, Chester and Oxford. However, Green Belt is the principal focus in this case study of Durham. The designation in Durham was in 1999, with the boundaries established in detail in 2004. The background to designation is well documented, and a main aim of this case study was to identify the Green Belt's impact on protecting the internationally important heritage of Durham over the last 15 years.

Suggestions for a Green Belt around Durham date back to the 1960s, continuing through Regional Planning Guidance note 7 for the North East Region in 1993 which proposed a significant extension of the Newcastle Green Belt into County Durham (rather than just Durham City), and finally came into being via the Durham County Structure Plan in 1999. In 1996, the Structure Plan Examination-in-Pubic Panel had proposed a larger Green Belt than had been expected, covering the whole of North Durham. North Durham was one of five sub-regions within the former County and included the areas of Durham City and Chester-Le-Street.

The Durham Structure Plan set out the reasons for the new Green Belt: "A North Durham Green Belt is needed to check the sprawl of the Tyne and Wear conurbation, prevent towns in the north of the County from merging into one another, assist in safeguarding the countryside from encroachment and to preserve the setting and special character of Durham City. The Green Belt will also assist urban regeneration in the towns in the north west and east of County Durham and in the former mining villages around Durham City" (paragraph 7.4). The Structure Plan elicited representations from around 1,350 organisations and individuals, and half these related to the Green Belt.

Protecting Durham's character and setting featured strongly in the adopted Structure Plan's proposals for a Green Belt, as the following extracts show (with heritage-related material highlighted in italic). The intention was also to use the Green Belt to encourage growth in the parts of North Durham which most needed it, away from the city.

"The City provides unique opportunities for high quality employment, education and tourism development whilst *its outstanding character and setting, which enjoy international recognition, require the highest protection*. To this end, the City's special qualities should be reserved to support a higher order employment/education role with surrounding villages accommodating much of the District's housing requirements and general employment provision. The Green Belt is a key tool in delivering this strategy" (paragraph 5.22).

"In particular, *the environmental capacity of Durham City is largely determined by the need to protect the historic character and the setting of the town*. In the case of Durham City therefore, particular regard must be given to Policy 10 [see below], and the surrounding villages should continue to accommodate much of the District's new housing. In Chester-le-Street the capacity of both the town and the surrounding villages to accommodate new housing development is limited by the need to protect the remaining countryside and to avoid the coalescence of the existing built up areas" (paragraph 6.10).

"*The unrestricted sprawl of Durham City northwards and Chester-le-Street southwards could result in the area of countryside between them becoming too small to remain effective in maintaining their separate character and preventing coalescence. The Green Belt in this location prevents the neighbouring towns of Chester-le-Street and Durham City from merging into one another, assists in safeguarding the countryside from encroachment and helps preserve the setting and special character of the historic Durham City*" (paragraph 7.6).

"Long established planning policies have sought to protect the setting and special character of Durham City. However *only Green Belt designation can ensure the permanent retention of those important open areas around the City which are vital to sustaining the outstanding, internationally recognised, environmental qualities of the City. An encircling Green Belt will secure the effective protection of the open land surrounding the City and will preserve the setting and special character of Durham City by preventing the unplanned outward expansion of the City and coalescence with the surrounding villages. The most appropriate locations for new development in the District, if it cannot be accommodated in Durham City, are the larger villages readily accessible to the City which could benefit from new investment to assist their regeneration*" (paragraph 7.7).

From this it can be seen that the Green Belt was seen as encouraging the regeneration of urban areas and as a means of encouraging revival in the depressed old mining towns of north Durham. There were, of course, economic arguments against these and they were particularly pronounced, and essentially accepted, in respect of the impact of a Green Belt on the whole of north Durham (as proposed by the EiP Panel). In particular, covering the old mining villages in Green Belt was seen as killing off the only hope of securing at least some development in these settlements. The 1999 Structure Plan therefore decided upon a Green Belt extending south westwards from Chester-Le-Street to encircle Durham City.

As a close corollary to the new Green Belt, the Structure Plan's housing proposals identified that Durham's unique environment along with other factors had generated a demand for housing. But it also reaffirmed that *"the protection of the traditional character and setting of the City, particularly the World Heritage Site, is an overriding consideration. Excessive new housing would seriously erode the City's environmental quality and could prejudice efforts to regenerate other parts of the County and the Region. The approach to the release of additional sites in the District is set out in Policy 10. This reflects the continuation of the existing strategy of accommodating much of the District's housing requirements in the villages"* (paragraph 8.19).

The Structure Plan further explained that "*In the City of Durham District, the protection of the traditional character and setting of Durham City, particularly the World Heritage Site, is an overriding consideration (Policies 5, 6 and 60). Releases of housing land which would extend the built-up area of Durham City into the surrounding countryside would damage its unique character and setting. The principle of accommodating most new housing development in the District in villages around the City has worked well. It has assisted in protecting the character and setting of the City and with the regeneration of many of the villages. The larger villages are conveniently located to the City, provide a reasonable range*

of social and other facilities and are well served by public transport. There are also major employment opportunities at Bowburn and Meadowfield (paragraph 8.34).

Policy 10 then stated: "In Durham city new housing development should take the form of redevelopment, infilling or consolidation of the existing built up area. The most appropriate locations for housing development in the rest of the district are the larger villages readily accessible to Durham city."

The adopted Local Plan of 2004

This plan was prepared in the context of the 1999 Structure Plan for Durham County and hence one of its main purposes was to define the detailed boundaries of the Green Belt that had been proposed in the Structure Plan.

The 2004 Local Plan highlighted the importance of the City's heritage where "the special character, setting and architectural quality of the City Centre, dominated by the WHS is a marked contrast to the mineral despoliation of some of its rural parts". This plan anticipated a stable population over the plan period, albeit with changing household formation, and its strategy for the location of new housing was to continue the policies that had operated for many years – namely "a considerable measure of restraint within Durham City and attempts to guide most new housing into the surrounding villages... to recognise its unique character and setting [which] make it physically and environmentally unable to absorb the level of housing which market forces might otherwise attract". It did, nonetheless, include major projects such as the Princes Bishop retail development, the proposed Millennium City Project and the Walkergate redevelopments.

The Local Plan had a strong heritage and environment base. One of its two aims was "To maintain the City of Durham as an attractive place to live, work and visit through the creation of a vibrant City and District whose unique character is conserved and enhanced in ways which do not compromise the quality of the environment or the quality of life of future generations". Heritage and environment themes permeate the plan's strategy, policies and supporting statements. So far as Green Belt is concerned, the Plan states:

> "*The Structure Plan makes clear that an all encompassing Green Belt around Durham City is necessary to preserve its special character and setting which encompasses the high quality landscape and undulating topography of open land around the City along with strategic gaps between settlements. It highlights the importance of maintaining the strategic gap between Chester-le-Street and Durham City to prevent the linking up of these urban areas*" (paragraph 3.10).
>
> "*The boundaries of the Durham City Green Belt include land which is vital to the character and setting of Durham City and is likely to be subject to development pressures which cannot be controlled by normal development control policies. It includes green fingers of land that penetrate the City at Aykley Heads and Flass Vale; substantial areas of high landscape value around the City, including parts of the Browney Valley and the Wear Valley; and the strategic gap to the north of the City, adjacent to the proposed Chester-le-Street Green Belt. The detailed boundaries of the Green Belt are shown on the*

Proposals Map. It is acknowledged that provision should be made for particular development needs in the long term and some Areas of High Landscape Value which are capable of accommodating development of a particular type, scale and in a well designed form are specifically excluded from the Green Belt. Outer boundaries have been defined using easily recognisable features like roads and footpaths, in accordance with relevant Government Advice" (paragraph 3.12).

"*It is the City Council's intention that the green belt boundaries defined on the Proposals Map should remain permanent and unchanged beyond the current Plan period (i.e. 2006)*" (paragraph 3.18).

The Local Plan defines a Green Belt around Durham which is drawn tightly around its built up areas and includes land that is close to the city centre. The purpose of the Green Belt could hardly have been more clearly stated and the Local Plan could hardly have been clearer in its focus on the character and setting of the City, while the Plan's detailed policies gave further expression to these objectives and strategies.

The Inspector who held the Inquiry into the Local Plan came to very clear conclusions about the Durham Green Belt, (inter alia) that:

"*The setting and special character of Durham derive their importance not only from direct views of buildings on the peninsula or from the intrinsic architectural or landscape quality of the town and its setting, but from the relationship between the physical size and topography of the built-up area and the open areas around it, and the glimpses from inside and outside the built-up area of both the peninsula and open land outside the City. In essence the character of Durham does not derive solely from views of the Cathedral and Castle but from the relationship between them and the actual physical size of the built-up area. For these qualities to be preserved it will in general be necessary to prevent further outward expansion of the built-up area. An increase in the physical size of the City, irrespective of any effects on views or countryside quality, would be likely to have a generally harmful effect on the character of the City. Those fingers of open space which extend right into the built-up area are of particular importance in terms of the special character of Durham.*"

Broadly speaking, this Green Belt policy has been successful between 2004 and 2014 notably in protecting Durham's heritage, in encouraging urban regeneration and in promoting development in the mining villages (which otherwise would have been most unlikely to happen, particularly with the reduced public sector funding that once enabled the provision of new employment facilities there). The position seems to be that considerable development prevented from taking the most financially attractive sites around the city was to some extent still achievable in the locations preferred by planning policy.

The approach to the city from the north: the traditional form, scale and detail of the new development on the right (Highgate) leads the eye to the Cathedral

At Highgate, the quality of materials, design and detail is continued throughout the development - rather than being confined to its 'public face' which fronts onto the main road

The emerging Local Plan

The new unitary authority (established in 2009) has completed the principal consultation on the 'Pre-Submission' version of its emerging County Durham Plan and has submitted this for Examination. This Plan has a very different focus and emphasis from the 1999 Structure Plan and 2004 Local Plan. The former Structure Plan and saved Local Plan created a tight Green Belt around the city to protect the historic city and to encourage regeneration of the encircling former mining communities. Instead the emphasis is set out in Strategic Objective 2 Durham City: *"To fulfil Durham City's potential as a regional economic asset for the benefit of the whole County, whilst respecting its outstanding historic environment and setting".* Durham City is to be a focus of development, with strategic sites on the edge of the city totalling 247 hectares removed from Green Belt to help to achieve the regeneration across the whole County. This is in line with the policy approach of the Sustainable Community Strategy.

The role of the Green Belt is explained as follows:-

> "*The economic circumstances when the Durham City Green Belt was designated were different to the pressures currently being faced. Whilst the Green Belt designation was appropriate at the time and in the context that the City of Durham Local Plan was operating. The new unitary authority established in 2009 was able to have a fresh perspective on the needs of the County and able to view the area as a whole. Furthermore the economic circumstances between then and now are very different and we believe the Spatial Approach of the Plan is most appropriate to deal with the challenges we are facing now and in the future*" (Submitted Plan, paragraph 4.201).

The emerging Local Plan included policies supportive of heritage, notably Strategic Objective 15: Built and Historic Environment "*To protect and enhance County Durham's locally, nationally and internationally important built and historic environment, including its wide range of buildings, sites, archaeology and other heritage assets*". Policy 45: Durham Cathedral and Castle World Heritage Site is couched in terms of "*requiring development proposals to demonstrate that consideration has been given to their impacts*" on the WHS as the means of protecting it. "*Development will therefore need to demonstrate that opportunities have been taken to positively contribute to the WHS and its setting and that they support its sustainable management.*"

Policy 6 "*identifies Durham City as a key location for new development in County Durham. The Plan therefore identifies approximately 23 hectares of employment land, 5,200 new houses and 5,800m^2 of new convenience retail floorspace. The Plan therefore (a) prioritises the redevelopment of land and buildings around the historic core of the City which support its key role as an employment, housing, retail and tourist centre;….*". The Policy also states that it respects the special character of the historic centre and World Heritage Site. Development of the strategy has involved a detailed assessment of constraints to narrow the strategic sites for release to those with the lowest impact on the historic city.

Potential impact of proposed Green Belt land releases on Durham's heritage

The proposals in the emerging Local Plan involve the deletion of sites from the Green Belt at Aykley Heads, Sniperley Park, North of Arnison and Sherburn Road. These "Strategic Green Belt Alterations" were identified following a detailed assessment of constraints including landscape to ensure that the impact on Durham City's special character and the World Heritage Site was minimised. The Council's intention is that the remaining Green Belt will continue to ensure that the setting and special character of Durham City is preserved. The Examination of the Local Plan will consider the impact of the proposals individually and collectively on the purposes of Green Belt designation, including on the attributes of Outstanding Universal Value of the World Heritage Site.

Aykley Heads is the Green Belt finger of land just north of the city centre, inside the East Coast main line and adjacent to County Hall, which contains the Police Headquarters (and its replacement, currently under construction). Aykley Heads is also within the designated Area of High Landscape Value. The proposal is to remove 16.5 hectares from the Green Belt for 70,000m^2 of new high quality flexible office floorspace to attract national and international employers with the potential to accommodate 6,000 jobs. The emerging Local Plan states

> "deletion from the Green Belt is necessary to provide sufficient range and choice of development sites to ensure it is attractive to employers. It is also the case that the existing Green Belt boundary was so tightly drawn around the City that the existing car park of County Hall is included within it. This was unnecessarily restrictive...[and] as job creation is a key objective of the Plan, Aykley Heads is seen as the best opportunity in the County to create jobs we believe that this is sufficient justification to amend the Green Belt".

In contrast the 2004 Local Plan states:

> "The boundaries of the Durham City Green Belt include land which is vital to the character and setting of Durham City and is likely to be subject to development pressures which cannot be controlled by normal development control policies. It includes green fingers of land that penetrate the City at Aykley Heads and Flass Vale…"

The other three major sites are on the urban edge. The existing Arnison centre two miles north of the city centre is a District Centre with a large range of retail units. The North of Arnison site is proposed for 1,000 houses on 84 hectares off Rotary Way, where a site will also be identified for a new supermarket and petrol filling station. The emerging Plan states that this development will have:

> "Clearly defined boundaries that respect and respond to the Green Belt beyond" (paragraph 4.116).

The Local Plan 2004 stated that Rotary Way forms the Green Belt boundary and the land now proposed for development was described as being part of the strategic gap between Durham and Chester-le-Street. The Local Plan Inspector commented:

> "Whilst this is certainly well located in relation to facilities and to public transport it is an area of particularly high importance in terms of the aims of the Green Belt. Decisions as to the line of the Northern By-Pass and whether or not it should be built would be unlikely to affect this, so that I would regard this as an area which should certainly be

included in the Green Belt and where it is hard to envisage exceptional circumstances sufficient to justify its removal from it for allocation and development."

View from Aykley Heads looking east to the "outer bowl" and the eastern suburbs with the East Coast Main Line across the centre of the picture

View towards the cathedral and castle from Aykley Heads

Sniperley Park is adjacent to a locally defined Historic Park and Garden and is in part designated as an Area of High Landscape Value. 2,500 houses are proposed here on 140 hectares of land, west of the A167 near to the park and ride car park. Here, "the design of development near to Sniperley Hall and Farm will have regard to their character and setting" and will "treat any potential views to the World Heritage Site appropriately". . The Council has prepared an SPD for this and the other strategic sites and carried out detailed analysis of the impact of the proposal on the WHS, the historic city and nearby heritage assets. Also, 475 houses are proposed on 25 hectares at Sherburn Road east of the city centre.

Lessons learned

The whole thrust of the former Structure Plan, the Regional Planning Guidance and the adopted Local Plan was protection of the unique character and setting of Durham City and its World Heritage Site largely via a tightly drawn and very restrictive Green Belt. Since its establishment, the Durham Green Belt has been largely successful in preserving the setting and character of the city. The Green Belt comes close into the heart of the city and includes the green spaces that are an integral part of its character. The emerging Plan in contrast is clearly articulated, proposing to release land from the Green Belt to regenerate a deprived county. In doing so the new unitary authority seeks to minimise the impact on individual heritage assets. The Inspector examining the submitted Plan will address whether these Green Belt releases affect the setting of Durham and whether they should be allowed.

The principal lesson from Durham is therefore that at present the jury is still out on how the Green Belt should perform its role in relation to heritage. Most of the Durham Green Belt is proposed to remain in place, but the new policy approach is less sympathetic to the Green Belt as a means of protecting the City and the World Heritage Site. Nonetheless, the Supplementary Planning Documents prepared for each of the major sites set the parameters for development and include references to the heritage assets concerned – including the Cathedral and Castle. Durham's Green Belt is recent and may be treated by some parties as less permanent than other Green Belts (though there is no policy basis for that view).

APPENDIX 7

LICHFIELD CASE STUDY

Special qualities

Lichfield is a small city in Staffordshire with a population of some 32,000. Its origins are obscure but there was a Roman fort near the present village of Wall – some two miles south of the city. Its prominence as a city coincides with the establishment of a bishopric in 669 and the first church here probably stood on the site of the present cathedral.

The settlement quickly grew as the ecclesiastical centre of the powerful Kingdom of Mercia and its development was consolidated in the 12th century when the cathedral close was fortified and the street pattern – which still survives – was laid out. It suffered in the Civil War but the damaged cathedral and close were rebuilt and in the 18th century it became a centre of genteel society and was known as a "city of philosophers".

It expanded rapidly in the mid-late 20th century but has retained a separate identity even though it is only some 16 miles from Birmingham. The city centre contains a large number of fine historic buildings. The three spires of its cathedral are unique in England and along with the city's other two church spires they combine to form much loved local landmarks. The medieval pools and later parks that run through the centre are an important part of its character and create an attractive setting at its heart.

The three spires of Lichfield Cathedral

The setting of Lichfield

The city is set on fairly flat ground that slopes generally from the high ground of Cannock Chase (an Area of Outstanding Natural Beauty) to the west and the valleys of the Rivers Trent and Tame to the east. It sits in a shallow bowl and although the surrounding hills and ridges are not much higher, views of the city's spires are not wholly uninterrupted and from some directions they are only seen from fairly close proximity to the city limits. Within the city a number of parks provide an attractive green corridor through the city and several new buildings achieve high quality design – while others fail to do so and have affected views of the cathedral. These are explored further in the section on Urban Design.

The development challenge

The housing requirements for Lichfield District are to deliver 8,700 new dwellings over a twenty year period from 2008 to 2028 to a hierarchy of settlements according to its spatial strategy. Lichfield itself will take approximately 32% of the housing growth (2,775 dwellings) principally through Strategic Development Allocations two of which are to the south and one to the east of the city. Development to the south (450 homes) will involve the release of Green Belt land for housing. This caused some local tensions and the Lichfield Civic Society had made representations at the examination that other land was more suitable to accommodate the planned expansion.

To the east of the city, the Green Belt outer boundary is the West Coast mainline. The land proposed for housing at Streethay (750 homes) lies beyond this and hence has no Green Belt implications. Views into and out of the city from this relatively low lying area are largely obscured by three tower blocks (which have a negative impact). The development framework to be established is the product of negotiation with council officers, based on pre-application discussions and public consultation, and will guide built development to the lower part of the site, while the higher ground (which could affect the setting of the city) will be used as open space/park.

Lichfield is currently operating in something of a planning vacuum in that the most recent Lichfield Local Plan of 1998 is out of date but a new Local Plan has not yet been adopted. The Inspector who held the Examination of the emerging Local Plan indicated in September 2013 that the Plan would be unsound unless land was identified for an additional 900 dwellings. Proposals have been put forward and consulted on, and the Council is hopeful that the Plan will be adopted in autumn 2014. In the interim period developers have tried to take advantage of the lack of a five year supply of land for housing and the uncertainty between examination and adoption of the Plan. Applications have been submitted on sites not identified in the emerging Plan and the Council has been trying to hold the line on heritage at appeals.

There are objections from English Heritage to two new sites added in the Main Modifications consultations – both south of Lichfield namely Cricket Lane and Deans Slade Farm. English Heritage has also raised an objection to an Amendment to an existing proposed Strategic Development Allocation at Fradley, some distance from Lichfield along the A38 towards Burton-on-Trent. The objections are that there is insufficient information

at this stage to determine whether the alternative proposed site allocations are sustainable in the context of national policy and the protection and enhancement of the historic environment. English Heritage had previously raised comments about the importance of protecting views to the Cathedral and the skyline and setting of the historic city. To ensure that growth to the south does not impinge on the setting of Wall Roman site (which is in the care of English Heritage) it has requested that the additional information required should be provided through a heritage impact assessment. Whilst this will provide the information that English Heritage feels is lacking, it may not address their concerns and hence their objection remains.

Previous planning for Lichfield's character and setting

The former Lichfield Local Plan 1998 was prepared in the context of the Staffordshire and Stoke-on-Trent Structure Plan which proposed 6700 dwellings for the district between 1986 and 2001. In approving the Structure Plan the Secretary of State recognised that there were constraints on meeting the full level of demand including the Green Belt, the need to protect Lichfield as a historic city and the high quality of its environment. Protection of Lichfield's character is therefore not a new consideration.

Several documents have previously informed the relationship between Lichfield's heritage and its growth: the Lichfield Local Plan 1998, the Residential Design Guide 2007 and the Lichfield City Conservation Area Appraisal 2009. In addition council officers produced a Skyline Study as an internal document in response to, and to co-ordinate, major development enquiries in and around the city centre. The subsequent effect of these policies, with particular reference to urban design issues, is considered later in this case study.

The 1998 Local Plan included numerous detailed policies relevant to the City centre related to the setting and surroundings of conservation areas, the protection of important views including those into and out of such areas, and the scale and character of buildings. There were specific policies for Lichfield, where the introduction referred to its conservation area as of national importance for historic and architectural interest. In addition there were several policies relating to specific sites and preservation of their character, as well as shopfronts and protection of views.

A Residential Design Guide was produced as a Supplementary Planning Document in 2007. This is a district-wide document but it is clear that recent developments around the city centre have adopted many of its principles. This Design Guide is cross-referenced with Regional Character Areas, the District Council's Biodiversity & Landscape SPD and Staffordshire County Council's (unadopted) Residential Design Guide.

The Lichfield City Conservation Area Appraisal 2009 is a comprehensive document which identifies several character areas, and in each of these views and vistas are identified and described.

New policy and practice

The most relevant planning policies are in the emerging new style Local Plan. Core Policy 14: Our Built and Historic Environment covers heritage assets and their setting and Policy BE1: High Quality Development addresses the provision of a high quality sustainable built environment. In addition the Corporate Plan takes a positive approach to heritage issues. Although it does not refer specifically to the setting of the city, it aims to protect heritage assets, enhance and protect the district's built environment assets, its historic environment, open spaces and local distinctiveness. It also recognises that heritage can help deliver a more prosperous district.

There has been a change of approach in drafting the conservation and design policies in the emerging Local Plan. The decision was taken to place more weight on Supplementary Planning Documents on Historic Environment and on Sustainable Development. These are well advanced and will be ready for adoption soon after the Local Plan – with links to these SPDs – is adopted.

Weight has consistently been given to housing growth and considerable numbers of dwellings have had to be delivered. The Council has long engaged in pre-application discussions and negotiations leading to an environment within which agents and developers have been appreciative of having someone to talk to about their proposals. The Local Plan is intended to be a different, more proactive policy vehicle than previously, which aims to be positive about where development can go as opposed to where it can't go.

Methodology for assessing development proposals

Lichfield has been a principal location for using historic characterisation methods to inform the choice of areas for urban development in the forward planning system and for assessing development proposals. Two main tools have been used: Historic Landscape Characterisation and the Extensive Urban Survey. Both stem from work across Staffordshire.

Historic Landscape Characterisation

The methodology was undertaken in two phases. The first phase was to identify Historic Environment Character Areas (HECAs) to provide an overview of the historic environment across the district (work having already been carried out which identified 77 Historic Environment Character Areas across the whole county). This linked the Historic Landscape Characterisations (which had also been identified for the county) with the Historic Environment Records data. The process was further informed by a general understanding of the topographic, land form and general drift geology influences upon human activity and agencies.

Phase 2 provided a more detailed Historic Environment Assessment of areas around Lichfield, Burntwood and Tamworth, identifying Historic Environment Character Zones. The HECZs are more geographically discrete than the HECAs and enable a more detailed analysis of the historic environment to be carried out. This is done by summarising the main areas of

interest and the archaeological and historic character of each zone and then using a scoring system based upon set criteria to rank them in terms of their significance.

A report was produced for each area and its summary included a short paragraph on the importance of the historic environment, an examination of the impact of medium to large scale development on that area, along with guidance or advice on opportunities to ensure the conservation and enhancement of historic environment assets.

At an early stage in the planning process this methodology identifies areas where the historic environment is a consideration when identifying the most appropriate locations for new housing development in the site allocation process. By way of examples, two such areas are described very briefly below

The principal Historic Environment Character Area for the City of Lichfield itself and south west to Wall – namely HECA 10a (containing four HECZs) – identified the Historic Environment Potential of this HECA as "High archaeological potential within the core of Lichfield and Wall. Potential in areas in between including associated with earlier settlement". The refined HLC map for this area identifies 18 landscape categories.

South and east of the City HECA 2a identifies the Historic Character as a "Dispersed settlement pattern; predominantly 18th/19th century field systems, formerly heath and woodland" and its Historic Environmental Potential as "Potential for prehistoric and Roman sites. Well surviving historic landscape; potential within historic settlement cores (surviving and deserted) and farmsteads".

At a more detailed level a Historic Assets Summary table is provided for the individual HECZs. This assesses and scores the following categories - Survival, Potential, Documentation, Diversity, Group Association, Amenity Value, Sensitivity to Change (to housing expansion & infrastructure for LBC) and allocates a final score to each zone. The evidence provided by the system was used to identify sites proposed for development.

Extensive Urban Survey

The Extensive Urban Survey (EUS) builds on this earlier HLC work and forms part of the national programme initiated and supported by English Heritage. The EUS provides a greater depth of information than the HLC and aims to understand the development and current historic character of the town. It has been produced for all medieval towns in Staffordshire.

It examines the setting of the town with regards to its location, its geology and topography and lists the sources used in the subsequent analysis. The context and historical development is considered in seven periods from prehistoric to the 20th and 21st century and maps 33 Historic Urban Character Areas (HUCAs). In these, it evaluates the nature and extent of surviving heritage assets, which encompasses buildings, monuments (above and below ground archaeology), place, areas, landscapes and townscapes. In doing so, it assigns values based upon the guidelines produced by English Heritage in "Conservation Principles" (2008) namely Evidential Value, Historical Value, Aesthetic Value and

Communal Value. It applies high, medium or low value to each of these to indicate the likely sensitivities of the historic environment in each of the 33 HUCAs.

The assessment of each HUCA includes a Statement of Heritage Significance, Built Character, Heritage values and Recommendations. It outlines the city as a place of pilgrimage to St Chad's shrine from the late 7th to the 16th century and as the focus of a network of roads linking London, Chester/Stafford, Burton and Tamworth since at least the medieval period. From the early 19th century Lichfield became a tourist destination for admirers of Dr Samuel Johnson.

Analysis of the plan form of the town shows possible early medieval settlement along five roads within the project area, and that the Cathedral and its Close has formed a focal point in the townscape from the early medieval period. The extant plan of the historic core was laid out in the mid-12th century and there is a good survival of historic buildings throughout the medieval streets although many of the timber framed buildings have later facades. There are six medieval religious sites (three churches, two hospitals and the Friary) and the scheduled Prince Rupert's Mound represents the physical evidence of Lichfield's role during the Civil War. The suburban extension of the core beyond the town gates possibly started from the 13th century but there are few areas of 18th or 19th century expansion and most of the town's growth occurred during the 20th century.

Urban Design considerations.

In addition to the formal methodology of Historic Landscape Characterisation, the district council places a high emphasis on urban design. Various major developments have been the subject of Design Review panels set up by a partnership of local authorities covering the southern part of the county of Staffordshire together with MADE, which is the West Midlands architecture centre, originally the regional arm of the Commission for Architecture and the Built Environment (CABE). Judgements about new buildings and developments, their aesthetic qualities, the contribution that they make to shaping places, and the quality of the environment that they create are based on established urban design principles, in order to reduce or remove matters of subjectivity and taste from discussions. Lichfield has certainly benefited from this approach over the last ten years or so.

Darwin Park (immediately west of the city centre) is a recent development originally proposed for 600 dwellings but where the demand for higher densities resulted in almost 1100 being built. This was not universally accepted and the local Civic Society noted that the number of dwellings almost doubled but with no corresponding increase in open space. Nonetheless there is a high quality of design here and an attractive public realm has created new vistas of the cathedral spires.

City Wharf faces the train station and provides a favourable impression of the city for visitors arriving by train. Within the development a mix of house types creates a high quality development where a vista to the cathedral has been incorporated into the layout.

The Oval at Darwin Park: a large new crescent- shaped building fronting onto a generous public open space at a busy road junction near to the city centre

Darwin Park and the new vista to the cathedral spires.

City Wharf: a prominent site facing the city's railway station with contemporary modern architecture

City Wharf: vista to the spires

Modern design rarely attracts universal approval but proves that contemporary architecture can sit in a historic context as with this restaurant across Minster Pool from the cathedral

Lessons learnt

Historic Landscape Characterisation (and its associated Historic Environment Character Areas) together with the Extensive Urban Survey (with its more detailed Historic Urban Character Areas) are complementary methodologies by which the sensitivity of sites to development can be objectively assessed. This is the case in Lichfield – albeit that English Heritage raised objections to two development sites that were added to the Core Strategy as a result of modifications to the plan on the grounds that their potential had not been adequately assessed. At the time of writing, this remains to be resolved and it is possible that views of the city's spires could be affected by proposed developments.

Overall, the council has a positive approach to urban design. Its practice of establishing design frameworks within which new development must sit is an encouraging and commendable practice, as is its recognition of the importance of creating new vistas to the Cathedral spires. Its acceptance of contemporary modern buildings is also notable.

APPENDIX 8

OXFORD CASE STUDY

Special qualities

This is well explained in the proud boast that opens the Council's Core Strategy, namely that "While many cities aspire to be world class, residents in Oxford know that our city is in many respects already world class. Oxford's unique heritage draws visitors from around the world. Its universities and hospitals have an internationally renowned research base and many products or services made in Oxford are known worldwide".

The oft quoted reference to the "Dreaming spires" encapsulates the very essence of how many residents and visitors alike perceive this unique city and clearly the best parts of Oxford are a match for the best parts of any city on a worldwide scale. The architectural gems that characterise the university, colleges and the streets of the historic core are indeed of very great architectural and historic interest and combine to create a townscape of high significance.

However there are elements within the city centre where the quality of the buildings and the public realm are poor and create an extremely poor impression of this world class city. Beyond the confines of the city centre large areas of twentieth century housing create undistinguished environments.

The Radcliffe Camera and All Souls

The setting of Oxford

The earlier parts of the city have an elongated form that lies very roughly north/south on either side of the two main roads that run through the city, bounded on the east by the

River Cherwell and on the west by the River Isis (or Thames) and the canal. Beyond the River Cherwell, to the east there are large areas of mainly twentieth century housing that now encompass some of the historic villages to the east and south east of the city centre. In many places the water meadows comprise a very attractive sylvan setting to Oxford and bring areas of tranquillity close to its heart. In addition to the buildings the city contains many open spaces, in the form of parks and college courts, and from many parts of the city the surrounding hills are seen from such spaces or are glimpsed between buildings.

The River Cherwell and its water meadows near to University Parks define the eastern edge of the city centre

Green spaces within and adjacent to the colleges are an integral element of the city's character as shown here at Merton College seen across Merton Green

Christ Church across Christ Church Meadow

Beyond the river valleys, the city is surrounded by ranges of hills and it is from these distant views that the “dreaming spires” are best appreciated. Artists have painted these scenes for hundreds of years and literary figures have described them in writings.

The Development Challenge

The challenges faced by Oxford are set out in the Core Strategy of March 2011 as follows.

> "Oxford is part of the South East of England and it should continue to grow and develop as the focus of the Central Oxfordshire sub-region. The South East Plan indicates that growth and regeneration should be the policy focus for the Central Oxfordshire sub-region. The Core Strategy must be in general conformity with that Plan, and therefore the City Council will deliver the development required by the South East Plan. This includes a minimum of 8,000 new homes within the city's administrative boundary in the period 2006 and 2026" (paragraph 1.2.1).

All this is set in the context of a scarcity of available land. Development is restricted by policy constraints, such as Green Belt, which encircles and extends into the city, and administrative constraints arising from Oxford's tightly drawn boundaries. There are also intrinsic constraints, such as extensive areas of flood plain…; areas of nature conservation importance; and the city's outstanding architectural heritage. The latter constrains development in a three-dimensional sense, since the need to protect Oxford's unique skyline make tall buildings inappropriate in some parts of the city” (paragraph 1.3.3).

The planned provision of 8,000 homes in the period 2006-26 is substantially less than the calculated housing requirements of the city: “The Oxfordshire Housing Market Assessment indicates that Oxford will need 64,189 new dwellings over the period 2006-16 to meet projected demand. This equates to an annual average demand of 6,418 dwellings, of which 3469 would be market housing and 2949 affordable housing. Considering that Oxford currently has around 55,000 dwellings, to meet demand over a 10 year period would mean at least doubling the size of the city” (Core Strategy page 17). A more recent Oxfordshire Strategic Housing Market Assessment completed in March 2014 concluded that the overall housing need in Oxford was in the range 1,200-1,600 annually depending on assumptions, which is less than a quarter of the previous figure.

A key challenge is nevertheless to meet needs while protecting the built and natural environment and ensuring that development does not prejudice its outstanding quality. Growth needs to respect the capacity of the city to absorb change and avoid harming its architectural and historic character. Meanwhile the Core Strategy is about more than housing growth and targets and has three “planks” which are:

- reducing the need to travel.
- regeneration and the reuse of previously developed land
- meeting Oxford's housing and employment needs.

The strategic locations for development are West End, Northern Gateway and land at Barton.

(i) West End has significant opportunities to create an attractive environment. It does not currently match the city's worldwide reputation and several busy and important routes are unattractive with a poor public realm. It is a highly sustainable location and regeneration here is fundamental to the overall long-term success of the city. 700-800 new dwellings are proposed as well as additional student accommodation.

(ii) Northern Gateway's principal opportunities for development are two key parcels of land on either side of a dual-carriageway section of the A44 identified as safeguarded land in the adopted local plan. The land has low landscape value, biodiversity and historic integrity but is in a visually sensitive location. It is principally a location for employment development.

(iii) Barton should deliver 800-1200 new homes. This land is east of the Barton estate. This is important to the setting of Headington but the integrity of the landscape has been lost and landscape quality is moderate.

Tensions are also caused by the firmly held desire of the powerful and highly influential University and Colleges to retain and enhance their facilities, including research facilities and student accommodation, within the core of the city.

<u>Previous planning policies</u>

The importance of the city’s dreaming spires has long been recognised in planning documents. The city has had a 'protected views' policy since 1962 when the then City Architect and Planning Officer observed that siting high buildings in Oxford presented particular problems because of the city’s unique skyline. He identified six viewpoints, to which the 1986 Oxford Local Plan introduced another four. Building heights policies and

successive development plans for the last fifty years have established a height limit of 18.2m or 79.3m above Ordnance Datum. However in the 1990's it was realised that this was a somewhat crude approach as in practice developers were using this as a 'standard' height so although buildings were no taller than this their roofscapes were poorly articulated with long expanses of roof or cornices at this height and little variation in between.

The *Character Assessment of Oxford and its Landscape Setting* produced by Land Use Consultants in 2003 established 20 "View cones" and this is now being further refined in a new View Cones Study.

The 2006 Local Plan included the following policies:

> POLICY HE.9 - HIGH BUILDING AREA
> Planning permission will not be granted for any development within a 1,200 metre radius of Carfax which exceeds 18.2 m (60 ft) in height or ordnance datum (height above sea level) 79.3 m (260 ft) (whichever is the lower) except for minor elements of no great bulk. A lesser height may be considered more appropriate for buildings that have to fit into the existing townscape. If existing buildings (at, or in excess of, these limits) are redeveloped, the City Council will consider carefully whether rebuilding to their previous height is acceptable in terms of how it would affect the appearance of the existing townscape and skyline. The area covered by the 1,200-metre radius of Carfax is identified on the Proposals Map.
>
> POLICY HE.10 - VIEW CONES OF OXFORD
> The City Council will seek to retain significant views both within Oxford and from outside, and protect the green backcloth from any adverse impact. Planning permission will not be granted for buildings or structures proposed within or close to the areas that are of special importance for the preservation of views of Oxford (the view cones) or buildings that are of a height which would detract from these views. The View Cones of Oxford are indicated on the Proposals Map.

<u>Current Planning Policies</u>

It is notable that in this "world class city", the Historic Environment does not warrant a specific section in the new Core Strategy. It is dealt with in Section 6 of the Core Strategy entitled "Promoting Social Inclusion and Improving Quality of Life" which states that

> "New development should sit comfortably within its surroundings. The best way to achieve this is through high quality design that creates attractive and pleasant spaces. Oxford contains a great wealth of historic buildings, monuments and designated landscapes within a high quality townscape and landscape character. This special interest, appearance and character should be sustained for future generations to value and enjoy. Good urban design can create safer environments and help to create a sense of place and identity".

Section 6.1 is entitled "Urban design, townscape character and the historic environment" and the relevant policy is:

Policy CS18 – Urban Design, Townscape Character and the Historic Environment
Planning permission will only be granted for development that demonstrates high-quality urban design through:

- responding appropriately to the site and its surroundings;
- creating a strong sense of place;
- being easy to understand and to move through;
- being adaptable, in terms of providing buildings and spaces that could have alternative uses in future;
- contributing to an attractive public realm;
- high quality architecture.

Development proposals should respect and draw inspiration from Oxford's unique historic environment (above and below ground), responding positively to the character and distinctiveness of the locality. Development must not result in loss or damage to important historic features, or their settings, particularly those of national importance and, where appropriate, should include proposals for enhancement of the historic environment, particularly where these address local issues identified in, for example, conservation area character appraisal or management plans. Views of the skyline of the historic centre will be protected.

The Civic Society considers these to be weakly worded policies that are not as robust as the saved policies from the old local plan.

The NPPF advises at paragraphs 169 and 170 that local planning authorities should have up to date evidence about the historic environment and also that where appropriate, landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity.

Recognising the need for an up to date evidence base the City Council is preparing a Heritage Plan which will include a new View Cones Study (which is considered in more detail below), an Archaeological Action Plan, and Historic Landscape and Urban Characterisation studies.

In addition, the City Council in conjunction with Oxford Preservation Trust and English Heritage has devised its own Character Appraisal Toolkit for use by all parties involved in the development process. It consists of a survey form upon which to record

- Initial reaction
- Spaces
- Buildings
- Views
- Landscape
- Ambience
- Final Reaction
- Spirit of Place

Under the first seven of these, the user gives a value (or score) to a set of up to 10 features. For example in the section on "Initial Reaction" the user would assess Spaces, Buildings, Views, Light/Dark, Surfaces, Greenery and Landscape, Uses and Activity, Noises and Smells

and General Comments. The final section "Spirit of the Place" sums up the character of the area picking out the most significant positive and negative features of its character and appearance.

The new View Cones Study

A Heritage Plan for Oxford is being prepared in collaboration between Oxford City Council English Heritage and Oxford Preservation Trust. They view Oxford's heritage as an important resource that adds to the quality of life in many ways, providing an attractive environment, generating tourism, a catalyst for regeneration and stability in times of change. Effective management of this historic environment is a high priority. The Heritage Plan aims to bring together the existing legislative and evidence based tools required to enable informed decision-making and unlock the potential to deliver the social, educational and economic benefits of Oxford's historic environment. The View Cones Study is one of a suite of studies that will form the evidence base for the Heritage Plan. Consultation is currently taking place on a draft with a view to adoption.

The new study identifies ten view cones which form a sample of views of the city and establishes a methodology of view assessment that can be applied to other areas of the city. It also points out that planning policies alone are not sufficient to protect views and that what is required is evidence and understanding to guide sensitive management of places. It highlights the historic and artistic interest of such views (with specific reference to individual paintings or prose) and explains that similar considerations to those established by the Landscape Institute in its Landscape and Visual Impact Assessment (LVIA) methodology are used here – namely the significance of the viewer, the viewing place and the landscape in the view.

However it moves things on by reference to current parlance and outlining that the city as a whole is a heritage asset, that viewing it is a historic experience and that the landscape in which it is set comprises a set of discrete landscape blocks each with specific historical associations.

The values established in "Conservation Principles" published by English Heritage (2008) are reiterated, namely Historical Value, Evidential Value, Aesthetic value and Communal Value, and the new study explains that it is important to understand the specific contribution of each view to the significance of the city, as much as to the value of what is seen in the view. The methodology assesses the heritage value of the viewers, the viewing place and the landscape in the view respectively.

"Considering the Viewers" requires a simple statement to summarise the history of viewing and the contribution this makes to the significance of the view as a recognised and appreciated experience of the heritage assets. This is followed by a simple table setting out four considerations.

"Considering the Viewing Place" looks at both how the viewing place contributes to the significance of the heritage assets in the view and how the viewing place, as a known or potential heritage asset, gains significance from being the place from which the view is seen.

For each view it is necessary to define the viewing place and it clarifies that this may not be one point but could be a wider area with, say, footpaths running through and hence from which differing views are obtained at different points. This is followed by an assessment that considers how the viewing place contributes to the significance of the view via a series of six questions.

"Considering the Landscape in the view" is the most complex element in the analysis. For each view a brief statement should describe the key features of the view that contribute to its heritage values. Each view should be considered as a whole landscape to which constituent elements contribute in different ways. The statement should characterise the contribution of these different elements including the features that make them, and draw out how these contribute to the heritage values of the features in the view. Eight landscape features such as topography, changes in views from movement around the viewing area, green character areas, different architectural character areas, focal features, infrastructure, changeable but predictable factors such as sunlight and seasonal changes, and conditions that create particular aesthetic impacts. These form the basis for a set of 10 questions (with guidelines/examples given for each).

The study refers to the ten views in the current Oxford Local Plan but acknowledges that there are many others, such as the examples in the *Character Assessment of Oxford and its Landscape Setting* (2003), and that other views may be identified in the future.

Context

Oxford faces complex and competing issues. Its role in delivering the growth required by the former South East Regional Strategy is severely constrained by planning policy as expressed in the Green Belt, by the quality of its natural and historic environment as assessed by the Landscape Character Assessment, and by administrative constraints deriving from its tightly drawn boundaries. The Core Strategy refers to housing requirements which could only be met by more than doubling Oxford's size in ten years, which would of course be extraordinarily challenging. There is some doubt that housing demand could ever be satisfied in Oxford, exacerbated by neighbouring authorities which are reluctant to accommodate Oxford's growth. In addition, Oxford City Council is a Labour-controlled authority surrounded by Conservative-controlled local authorities. Oxford Civic Trust has produced its own report *Oxford Futures* (March 2014) from a series of debates that "... highlights the need for much closer collaboration and seamless coordination between the different agencies involved in strategic development in the region. We need a common vision supported by all: the basis for planning policy. We need effective mechanisms for delivery. We need leadership".

The methodology prescribed for using the view cones appears to be comprehensive but may have shortcomings in its practical application. City Council officers describe the methods set out in the current local plan as too much of a geographic tool that takes insufficient account of cultural factors, whilst the Civic Society consider that their application is too closely constrained by lines drawn on a map, and there are important views of the city from places other than those identified by the cones. The emerging view cones study has had a long gestation period and extensive consultations have delayed its adoption and implementation.

View from the village of Elsfield, north-east of the city

View from an early View Cone identified in 2002 near Garsington, south-east of the city. Whether the height of the BMW car factory predates this view or not, the light coloured cladding emphasises its prominence and dominates any views to the spires beyond

Oxford's Dreaming Spires from Boars Hill south west of the city. The science park building left of centre may not exceed the stated height but its form is somewhat alien to the spires.

Not far from the city centre, The Oxford University Royal Naval Unit seems to show how far the public sector commissioning process has moved away from a culture which produced the exquisite architecture of the Royal Naval College at Dartmouth

Visitors to the station may not be wholly convinced by these buildings that they have arrived at a city of learning and culture.

There are suggestions that the sophisticated planning tools available such as the Character Assessment Document and the Appraisal Toolkit are not being applied routinely or well. Planning officers need to be managed so that these are used reliably and not depend on officers' individual preferences and prejudices. Instead of proper application of policy and use of best practice tools, there are indications that officers' advice is predicated around considerations of "what will happen if this goes to appeal?" and the two competing premises of "Is this good enough to approve?" or "Is this bad enough to refuse?".

It is also relevant to consider the character of the city (as well as its setting) and how this is affected by development pressures. There is a perception amongst the interviewees that developers are pushing the boundaries particularly of the height restriction policy to see just how high they can go. There are clearly areas within the city which would benefit from change such as the areas around the station, the Westgate shopping centre and the Castle, where redevelopment proposals are progressing. However these proposals may be hard to reconcile with archaeological interest and significance.

<u>Lessons leant</u>

The best parts of Oxford City are exquisite and fully deserving of the accolade "world class city". But it is also clear that not far from the dreaming spires, fields, colleges and sylvan settings of the river valleys there are areas where the quality of the townscape and public

realm leave much to be desired. These may represent opportunities for improvement but sensitive archaeological interest and significance may provide another set of tensions to be resolved.

The view cones established in 1962 are the subject of current revisions – possibly indicating that they have not been as successful as originally anticipated in protecting the city's skyline. Some of the distant views into the city have been compromised. View Cones are largely derived from considerations of landscape, but landscape is constantly changing. Views can alter dramatically over comparatively short timescales. The introduction of new infrastructure, the tree planting that often accompanies it, the removal of trees or the introduction of them all contribute to an evolving landscape and changing views. Delays in adopting the new View Cones Study (for whatever reasons) are unfortunate.

As with other authorities in the south-east, Oxford is required to accommodate significant levels of growth but, given how tightly its administrative boundaries are drawn, fully meeting its needs is likely to prove impractical within its own area. Three strategic locations are identified for the city, but the full housing requirement will necessarily require releases of land by neighbouring authorities. The City Council is preparing to make representations that these authorities are failing in their 'duty to cooperate' required in planning law. The inadequacy of the process of subregional co-operation on development to support the city, made worse by political differences with Oxford's neighbouring authorities, has tellingly prompted Oxford Civic Society to prepare its own document urging greater co-operation amongst all local authorities.

Oxford Civic Society has highlighted some uncomfortable perceptions that officers' advice in the City Council is affected by the vexed (old) axiom of "What chance have we got of winning an appeal if we refuse this application", and insufficiently by a determination to apply policy in order to protect properly the heritage assets of Oxford.

There are indications that approved methodologies such as the Character Assessment Toolkit and the View Cones Study are not being universally and equally applied in assessing development proposals. This does appear to raise sensitive management issues but may also reflect the current pressures on local planning authorities arising from staff cutbacks and competing pressures on those remaining to achieve targets for determining planning applications within set timescales.

APPENDIX 9

SALISBURY CASE STUDY

Special qualities

Salisbury is a city of 45,000 people in south-east Wiltshire. It is located in the valleys of five rivers, principally the River Nadder and River Avon, whose watermeadows define the city's southern edge. The city was laid out on a slightly skewed grid as a planned development from the 1220s onwards. This was prompted when the city of Old Sarum, on an 11 hectare hillfort site 1.5 miles to the north, became unsuitable: it lacked sufficient water and there was a falling out between the clergy and the King's garrison. Rising from the meadows at the south end of the town is Salisbury Cathedral, built principally in one campaign from 1220 to 1258, except for its spire which followed in the next century and is the tallest in England at 404^{ft}. The Salisbury Local Plan of 2003 comments "Salisbury is perhaps the best surviving example of a medieval planned town in England. The Cathedral and Close, the historic chequer pattern and the architectural quality, variety and coherence of the buildings combine to make this a city of outstanding historic interest."

John Constable depicted Salisbury about 300 times. One of his most famous paintings, *Salisbury Cathedral from the Meadows* 1831 was painted from near this spot.

The setting of Salisbury

Low chalk hills dissected by rivers surround Salisbury, so views to the city are available both from surrounding higher ground and from river level. Likewise views out from the city are often to undeveloped hillsides which are sensitive to any built development. Many of the approaches to Salisbury are attractive as the cathedral spire first comes into view, then the edge of this quite compact city is reached and the cathedral becomes increasingly prominent. Salisbury District Council commissioned a Landscape Character Assessment of the District from consultants Chris Blandford Associates which included a *Settlement Setting Assessments* report published in February 2008. This identified elevated and level views principally to the cathedral but also to other important landmarks (mainly buildings within the historic core which would have been important 150 years ago). It also identified: approaches to the city – particularly from where the spire can first be seen; gateways – the character of the approaches where the route becomes built-up and urban; and green fingers and corridors – penetrating from open countryside into the urban fabric. The study drew out five categories of setting on a plan of the area according to the importance of their contribution to Salisbury's setting, and further highlighted areas were urban development might most suitably be located with least adverse effects on the city's setting. However, the available evidence suggests that the use of this document for planning purposes is very limited.

Salisbury Cathedral west front from the A3094 near Netherhampton, looking down the River Nadder valley

An early view of the NW approach to Salisbury Cathedral, from Stratford-sub-Castle in the River Avon valley

The development challenge

Studies by Salisbury District Council and, after local government reorganisation in 2009, by Wiltshire Council showed that the city had an aging population and needed additional population to stimulate the labour market and create a climate for economic investment. The Councils were therefore keen to focus housing development on the city. In the preparation of the South Wiltshire Core Strategy, adopted in February 2012, 6,060 of the area's 9,900 dwellings were focused on Salisbury and the neighbouring town of Wilton. It is clear from the strategic allocations, together with previous allocations and unimplemented permissions, that Salisbury has been allocated about 55% of the area's housing requirement for 2006-2026, compared with its current 39% of the area's population. There is general agreement that urban intensification within the existing built-up area of Salisbury can supply only limited amounts of housing in relation to the quantities needed, so major peripheral expansion is inevitable.

Past planning for Salisbury's setting

The value of the setting of Salisbury's historic core has long been recognised. Since the 1960s planning policies have applied a '40 foot rule' policy, generally to constrain the height of new buildings in a defined central area to a maximum elevation of 40 foot above ground level and to control the roofscape. For example, Policy D6 in the Salisbury Local Plan stated in 2003: "All new buildings within the Salisbury Central Area will be controlled to a height that does not exceed 12.2 metres (40ft), and only pitched roofs clad in traditional materials will be permitted. Decorative architectural features that positively contribute to the variety, form and character of the area's roofscape, skyline and silhouette may be allowed to exceed this height where appropriate, provided that they do not result in any increase in usable floorspace". This policy has been remarkably successful over the years, consistently applied by the local planning authority and upheld by Inspectors and Secretary of State at appeals. The result has been to sustain the traditional scale, character and townscape in the city centre, and to set off the soaring scale of the Cathedral from both near and distant viewpoints. This remains the Council's flagship policy for protecting Salisbury's setting.

Salisbury from Old Sarum (Cathedral 2 miles distant to the south), showing the impact of the 40 foot rule on development in the historic core (which is positioned mainly to the left and in front of the Cathedral)

The Salisbury Local Plan 2003 also aimed to protect the wider setting of the city by controlling development in its hinterland. Policy C7 provided that "Within the Landscape Setting of Salisbury and Wilton as defined on the Proposals Map, new development will not be permitted during the lifetime of this Plan to ensure there would be no detriment to the visual quality of the landscape and to enable allocated developments to be assimilated". A map of the area around Salisbury showed where inappropriate development would not be permitted in order to protect the setting, providing assistance to both developers and the public. No problems implementing this policy were reported to this project.

Preparation of Core Strategies

One of the key features of Core Strategies and other Development Plan Documents prepared under the Planning and Compulsory Purchase Act 2004 is that their policies must demonstrably be supported by evidence. Considerable effort was therefore applied initially by Salisbury District Council and subsequently by Wiltshire Council to provide this. At the same time, the pressure for housing provision in Salisbury was challenging those policies which aimed to protect the city's setting. For example, there were calls from some senior officers and members in Salisbury District Council to relax the 40 foot rule. A *Review of the Salisbury Central Area '40ft Rule' policy* was therefore commissioned from Chris Blandford Associates (published August 2008) and public consultation undertaken. There was overwhelming public support for its retention, which resulted in the policy being taken forward, now as Core Policy 8 *Salisbury Skyline* in the South Wiltshire Core Strategy. Amendments were made to tighten the policy by defining the limited range of circumstances in which exceptions to the policy would be made, and these were specifically

endorsed by the Inspector examining the Strategy. This policy has also been carried forward without amendment into the emerging Wiltshire Core Strategy as Core Policy 22.

Policy C7 from the Salisbury Local Plan of 2003 and its delineation on the proposals map were also carried forward into the new system as a Saved Policy in the South Wiltshire Core Strategy, but this will be dropped when the emerging Wiltshire Core Strategy is adopted. Policy C7 is being replaced by a more general Core Policy 51. This has omitted reference to Salisbury specifically, but requires "that the following aspects of landscape character have been considered:…

ii. the locally distinctive character of settlements and their landscape settings;…
iv. visually sensitive skylines, soils, geological and topographical features;…
vi. important views and visual amenity;…".

The supporting text also refers to retaining the highly valued views of the Salisbury roofscape and spire views (paragraph 5.112) and notes that "Steep hillsides and river valleys also create prominent long views and skylines which help to define Wiltshire's settlements" (paragraph 6.119).

The principle therefore remains available in policy for implementation, but its non-specific nature and the loss of a defined setting on a Proposals Map will leave Salisbury's setting more exposed to testing by speculative planning applications. Therefore it will be critical that the Council can continue to demonstrate a 5 year land supply for housing in the terms now set by the National Planning Policy Framework, in order to successfully resist such speculative schemes. Proposals will also require more careful evaluation from heritage Conservation Officers, even though this will be more challenging as Wiltshire Council faces significant resource issues.

Accommodating the housing allocation to Salisbury was also challenging during the preparation of the South Wiltshire Core Strategy, reflecting the sensitive and constrained nature of the city and its setting. Four of the major allocations initially proposed by the Council were within the setting of Salisbury defined by Policy C7 from 2003: Salisbury Hospital, Odstock (1,000 dwellings), Fugglestone Red (1,250 dwellings), Hampton Park (500 dwellings) and Longhedge, Old Sarum (800 dwellings). To tackle the relationship between growth and heritage setting, Salisbury District Council and English Heritage jointly commissioned a *Salisbury Historic Environment Assessment* from Land Use Consultants (April 2009). This carefully examined the initial strategic allocation sites against a series of historic environment criteria. In all cases and another South of Netherhampton Road, Harnham (400 dwellings) the study found moderate risk relating to the 'settlement setting' criterion and proposed mitigating measures. Overall the Longhedge and Hampton Park sites were identified as 'high risk'. The sensitivities of each site, the impacts of developing them and required mitigation measures were expressed for each proposed allocation site, to ensure that the recommendations of the Historic Environment Assessment could be appreciated in future. Meeting housing need will continue to represents a significant challenge, given the shortage of brown field sites and readily developable unconstrained land.

The Council dropped the site adjacent to Salisbury Hospital at an early stage. In response to the historic environment assessment it substantially drew back the housing area at

Hampton Park both to protect the setting of Old Sarum and to protect the strategic landscape setting of the northern slopes of Salisbury. It also dropped the site South of Netherhampton Road, Harnham, and removed part of the Longhedge site (reduced to 450 dwellings), with heritage being a contributory factor in these decisions. However, these last two sites remain candidates for development in future. The Inspector examining the Strategy endorsed the changes made by the Council, and the Strategy was adopted on that basis in February 2012. The outcome demonstrates that the historic environment assessment made a real difference to the process of reconciling urban development with the setting of Salisbury. Even so, this did involve some erosion of setting, though more to Old Sarum than to the historic core of Salisbury. Wiltshire Council's intention has been to continue the recently adopted plan for South Wiltshire into the wider Wiltshire Core Strategy. However the Inspector examining the Strategy is recommending that Wiltshire Council increase its housing provision across Wiltshire, and it is unclear whether adjustments will be needed in the Salisbury area to accommodate a share of this. If required, the implications this might have for Salisbury's setting are as yet unclear.

Context

Councillors in Salisbury appreciate the value of the city's setting to its attraction, both to the tourist industry and to investors, and are supportive of 'the 40ft rule' on building heights in the historic centre. A redevelopment of a large Council-owned central area site at the Maltings is proceeding with close attention to high quality and to heritage interests, including views to the Cathedral. There is less familiarity amongst officers and members about policy to protect the wider setting, though the discussions about this during the preparation of the South Wiltshire Core Strategy acted as a reminder. Local government reorganisation incorporated Salisbury District Council into a wider Wiltshire Council in 2009, moving the centre of decision-making to Trowbridge with more planning policy and priorities decided centrally. Resource limitations have meant that officers have to be more reactive and less proactive in shaping development sympathetic to heritage.

Limited resources in Wiltshire Council have delayed the preparation of Conservation Area Appraisals for the five Conservation Areas in and around the city centre. These Appraisals have been in preparation since 2007 but fortunately are now approaching adoption in 2014, though the evidence in them has clearly been available for officers to use. They contain detailed information on townscape and distinctive local views within the historic core, and will be valuable additional evidence to help protect the setting of features in the city centre. A design guide for South Wiltshire *Creating Places* is also available and as a Supplementary Planning Document has formal status in planning practice.

Outcomes

The Core Strategy preparation process involved the commissioning of both landscape and historic landscape assessments which had a real effect in adjusting the location of major new urban development allocations in relation to the setting of Salisbury, though the results were not entirely satisfactory (reflecting the highly sensitive and constrained nature of Salisbury and its setting in relation to housing requirements). Nonetheless, the visual setting of the historic core has been protected, the river valleys with their views to the

centre have been protected, and the sense of approach to and arrival in Salisbury has been maintained (except from the north, past Old Sarum). These are notable achievements in view of the scale of development required in the area. Planning practice has for decades been highly successful in limiting the heights of buildings in the central area to 40ft, thereby maintaining the historic character, setting off the Cathedral and enhancing both low level and elevated views into the city from surrounding hills. This policy is widely understood, appreciated and applied. The same cannot be said for a setting protection policy and accompanying delineated area on the formal Proposals Map which are dedicated to protecting the landscape setting of Salisbury (and Wilton). However, there do not appear to have been major breaches of that policy. The effect of downgrading this to a weaker policy in the emerging Wiltshire Core Strategy remains to be seen. There are indications that the business community increasingly values the heritage setting of Salisbury, and this may have an impact on the weight which councillors give to the matter in future.

The first sight of Salisbury Cathedral spire from beside the A345 from Andover, marred by sprawling development north of the Old Sarum airfield. Land allocated for development at Longhedge will intervene in the line of sight to the Cathedral.

Lessons learnt

The relationship between evidence base, policy and practice is important. This has been achieved best in Salisbury with the long-standing '40ft rule' to control building heights in the city centre: the policy is understood and implemented well, and a review of the evidence base for it in 2008 reinforced its merit. The experience suggests that Councils can successfully apply restrictive policies for the benefit of the heritage in historic towns, consistent with the NPPF. The provisos appear to be that effort should be made to gain the support so far as possible of relevant groups such as the business community and the third sector, and that sufficient allocations should be made elsewhere for development.

Any necessary assessment should be commissioned as early as possible for the purposes of plan preparation. Landscape and historic environment assessments commissioned during the process of preparing a new Core Strategy were critically important to justify appropriate policies for reconciling growth with the setting of the city. However, in Salisbury these came

later than ideal, necessitating revisions to a number of strategic urban development site allocations in the plan.

Evidence and policies need to be applied on a day-to-day basis to be effective and to be seen as essential by developers. Valuable parts of the evidence base on setting may be little appreciated and little used, or only commissioned and used when a revised plan requires preparation. The design guide *Creating Places*, the landscape setting study *Settlement Setting Assessments*, and the policy for protecting the wider landscape setting of Salisbury do not appear to feature regularly in decisions or advice. More frequent application of these documents and policies may well raise their status. Credibility comes from applying policy on every relevant occasion and in a consistent manner (as 'the 40ft rule' illustrates).

APPENDIX 10

WINCHESTER CASE STUDY

Special qualities

Winchester is a compact city of 45,000 people in mid-Hampshire. It is set in the Itchen Valley and closely surrounded by low hills which offer fine views over the city noted for its tree cover. The chalk downs of the South Downs National Park rise immediately to the east. In this context even the longest cathedral in Europe does not dominate its surroundings. A striking feature of the city is that approaches on all the radial routes which converge on its core bring visitors to sharply-defined urban edges. Residential suburbs focus around the radial roads without the feeling of urban sprawl, and between these are green wedges which draw the countryside into the city.

Winchester was the capital of Saxon England and a major power-base throughout mediaeval times. More recently it was largely spared bombing in the Second World War and the excesses of 1960s building development. The city retains a fine built and archaeological heritage, and "has a complex historic townscape that has been more fully studied than any other Roman or medieval town in England" (*Hampshire Historic Landscape Assessment*, Hampshire County Council, 1998).

Winchester city centre: view west from St Giles's Hill (cathedral N transept to left, police building on skyline)

Significant local authority studies of the heritage interest of Winchester at the urban scale include the *Future of Winchester Study* (June 1999), the impressive *Winchester City and its Setting* (December 1998), and the comprehensive *Winchester District Landscape Character*

Assessment which includes historic landscape characterisation (March 2004). Many of the debates surrounding the urban extension have returned repeatedly to these documents for evidence. Townscape and landscape setting have long been written into planning policy for the city.

The development challenge

The pressure for growth in affluent Winchester is considerable. It is a very popular place to live for local work, commuting and retirement, and has become an increasingly important educational centre with the expansion of Winchester University alongside the mediaeval foundation of Winchester College. It has excellent road and rail communications (the M3 passes close by and the main railway line from London to Southampton passes through), and is also an important tourist destination. As the largest population centre within the Winchester City Council area, the city is under pressure to accommodate a share of the strong growth in household numbers typical of south-east England.

Planning background

Accommodating significant urban development in or around Winchester is difficult without compromising the city's heritage and special qualities. The City Council has supported urban concentration of development, including at higher densities, where this can be absorbed without damage to townscape and historic character, though the scale of additional housing which can be provided this way has limitations. There is also considerable competition for urban space: the city is delightfully free from peripheral retail parks and the Council has been keen to keep it that way by promoting retailing and other urban infrastructure within the city centre.

Outside the city there are challenges that development should not damage the setting of the town or cause sprawling out from the compact form over the surrounding hills. Risks are losses of green wedges, of clear urban edges, or of the gaps between the city and surrounding villages. Development in such places could potentially affecting the perception of the city from its core, from its approaches and from surrounding hills. Also challenging is avoiding any worsening of traffic congestion in the core from diffuse peripheral growth. Further afield there is a determination to avoid compromising the character of the authority's area by allowing anything more than small incremental change in the many attractive villages. Fortunately for meeting the Council's housing obligations, the District area extends to the fringes of the south Hampshire growth area, with major development possible to expand settlements such as Waterlooville (mainly in Havant) and Whiteley (mainly in Fareham). However, this pressure-release valve has for some time been recognised by the Council as insufficient.

Planning for an urban extension in principle

The principle of an urban extension to Winchester being an acceptable contribution to meeting growth requirements was first established in the Hampshire County Structure Plan 1996-2011 (Review) adopted in 2000, following discussion at an Examination-in-Public in 1996. This allocated a baseline of 7,295 dwellings to Winchester District for the period

1996-2011 and in addition required land to be set aside as a reserve, if needed, in various locations around Hampshire, including for 2,000 houses in a 'Winchester City (North) Major Development Area'. The need for releasing these would be depend primarily on emerging regional policy needs. The selection of Major Development Areas (MDAs) was underpinned by an evaluation of options, published in September 1998. This covered a wide range of relevant issues, including transport, economic and environmental matters, and was based on three key strategic planning objectives:

– minimise trip distances and reduce the need to travel;
– encourage the use and provision of public transport;
– integrate the development with the existing pattern of settlement, transportation infrastructure and surrounding land uses.

The choice of north Winchester for an urban extension location was therefore based on planning criteria in relation to housing need, quite independently of heritage, townscape and landscape setting interests.

Meanwhile, however, Winchester City Council prepared the *Future of Winchester Study*, published in June 1999, which focused on development and change within a strong heritage context. This recognised the limited availability of brownfield land within the city and the substantial pressure of housing demand, concluding that "there remains the need for some carefully planned growth over the next 30 years" (paragraph 7.9), and that "pressures from outside (e.g. regional housing demand) cannot be ignored and the city should be ready to respond, either by accepting and planning for such pressures or by demonstrating why they are undesirable in Winchester" (paragraph 2.17). It also considered that protection of green spaces around the city was usually a matter of judgement rather than essential: "maintaining green wedges/corridors should be realistically balanced with the city's community needs. Apart from the River Itchen and water meadows, which are of international ecological importance, the existing boundaries of the green wedges/corridors penetrating the city are not necessarily sacrosanct. It is their benefits and contribution to the city's character that is the most important" (paragraph 7.14).

To implement the Structure Plan, provision for the Winchester (North) development was made in Policy MDA2 of the Winchester District Local Plan Review adopted in July 2006. The Plan recognised that "at some point, continued concentration of development within the town could start to destroy the qualities that the [urban concentration] approach is seeking to protect and there will need to be some carefully planned growth". An extensive review of six alternative sites within an Area of Search had begun in 2001. That review applied fifteen evaluation criteria, two of which were heritage-related: settlement pattern (to maintain the compactness of the city and the separate identity of surrounding villages) and impact on landscape (to minimise the visual impact of development and protect features of importance to the landscape setting of Winchester). At the Inquiry in 2005 into objections to the local plan, both local organisations and developers put forward suggestions, but the objections were not upheld and the site at Barton Farm selected by the Council, fairly close to the city centre, was confirmed as a reserve site. The urban extension policy provided that development of the site would only be permitted if the Council was satisfied that a compelling justification for additional housing in the Winchester District has been identified by the strategic planning authorities.

The Winchester District Core Strategy (joint with the South Downs National Park Authority) provided land for building 12,500 houses across the District between 2011 and 2031, including 4,000 in Winchester. The Council promoted a firm allocation of 2,000 houses to Barton Farm despite a very large volume of local concern about a concurrent planning application for development of the site between 2010 and 2012 (see below). However, by the time the plan was examined in October-November 2012, permission had already been granted for the development of Barton Farm. Even allowing for the urban extension, the allocation to the City was still disproportionately small in relation to Winchester's size and requirements.

The site

Barton Farm occupies a green wedge north of Winchester city centre, bounded by the Andover Road to the west and the railway to the east. The land rises from the city towards a shallow ridgeline east-west within the site, which is capped by an impressive line of trees. Beyond, there are expansive views falling away to the north and north-west, while the tree-lined Roman Road to Andover continues to mark the western boundary. The northern boundary of the land allocated for 2,000 houses is Well House Lane, a roughly east-west minor road in a shallow valley north of the Barton Farm ridgeline. There are no views from the site, or from more distant views over it looking south, into the historic core of Winchester (though prominent buildings on the elevated Romsey Road are visible, notably the police building and, occasionally, the prison turret). The development would not therefore encroach into any of the twelve strategic views from which Winchester's historic silhouette should be particularly protected, as identified in the City Council's *Conservation Area Strategy 2003*. Barton Farm has a long history of being the most likely candidate for major housing development.

View SE over the Barton Farm (south) site towards the railway line from the ridgeline

View S over the Barton Farm (south) site from the ridgeline, police building just visible (one third from right)

View NW over Barton Farm (N) from the ridgeline, Andover Road to left, Well House Lane obscured in valley

Planning Inspectors' reviews of the Barton Farm site

(i) The site was not proposed by the Council for development in the Winchester District Local Plan adopted in 1998, though an objection was considered by the Inquiry Inspector for 450 houses on the site in his report in January 1997. This would have occupied the more visually contained land south of the ridgeline tree belt. The Inspector found no need for the additional land release proposed. On the character and setting of this part of Winchester he concluded that this was an important part of a Strategic Gap: "any change in the boundary of this gap on the Winchester side will unacceptably weaken the functions of this Strategic Gap which are vital in this area". He continued: "Winchester is characterised by long wedges and fingers of countryside running into the City. These create the green setting of Winchester, for which the City is famous. The objection site forms one such wedge of countryside…. [which] makes a substantial contribution to the setting and character of this side of Winchester particularly when approached from the north along Andover Road. The impact of housing development on the Objection site would, in my opinion, be substantial in that it would be intrusive in the landscape and would affect the views into and over the

Objection site. It would bring the urban edge of Winchester out into the open countryside in what I consider to be an unacceptable manner thereby seriously affecting the setting and character of Winchester…" (paragraph 11.79).

(ii) The proposed allocation of an MDA for 2,000 houses at Barton Farm to implement the Structure Plan was considered at the Inquiry into objections to the Winchester District Local Plan Review, with the Inspector reporting in September 2005. In confirming the allocation as noted above, the Inspector commented on character and setting issues. He found the Barton Farm ridgeline "significantly more preferable in minimising the effect on the landscape" (paragraph 12.15.11), but only if the site extended northward to Well House Lane would the area be sufficient to accommodate the MDA. He had considerable sympathy for the views expressed by the Inspector in 1997, but concluded this was not definitive: "despite my acknowledgement of the merits of the argument, the Inspector's use of the term 'unacceptable' was a judgement made in the context of the circumstances of 1997 and the then emerging Plan…. Structure Plan Policy H4 requires the designation of a reserve MDA at Winchester City (North) and…. the land south of Well House Lane at Barton Farm would be the optimum location. Furthermore, the fact remains that any urban extension will, by definition, irrevocably change the setting of a town or city and result in a loss of countryside. And in contrast with a smaller ad hoc development confined to housing with perhaps some ancillary open space, the designation of the reserve MDA does provide a real opportunity to create a new townscape of a high quality that will make a positive contribution to the special character of Winchester." In effect, he considered development of the Barton Farm site would be damaging to the landscape setting of Winchester, but was the least-bad option and that this scale of development had been found necessary in the wider interest.

(iii) A planning application was submitted in 2004 for 2,000 houses on the site, at the time Barton Farm was emerging as the Council's preferred location for a reserve MDA. Councillors agreed with the officers' recommendation of refusal on grounds of lack of need for release of the site, and at the subsequent appeal the Inspector recommended refusal on need grounds. In a decision on 20 February 2006 the Secretary of State agreed.

(iv) A further planning application was submitted in 2010 for 2,000 houses on the site. An appeal was lodged against non-determination, though the Council indicated it would have refused the application (contrary to their officers' recommendation). The Inspector recommended approval of the appeal, but in September 2011 the Secretary of State refused it on grounds of an insufficiently compelling justification for the release of a reserve site. Heritage, townscape and landscape setting issues contributed to that decision:

- "the appeal scheme does not comply with LP policy W1 which seeks to protect and enhance the special and historic character of Winchester and its landscape setting" (paragraph 27);
- "development of this attractive, greenfield site would…. conflict with LP policy CE.5 which seeks to protect the character of the landscape and the key characteristics of Landscape Character Areas" (paragraph 33);
- "The appeal site is not designated as a green wedge, but the Secretary of State agrees with objectors that its development would alter a valued part of the setting of the

historic city of Winchester and he concludes that this adds to the conflict he has already identified with LP policy W1" (paragraph 34).

That appeal decision was successfully challenged in the High Court and remitted to the Secretary of State for reconsideration. This time, in October 2012, the appeal was allowed, with the housing benefits providing the compelling justification required to release the site and outweighing the objections. He nonetheless reiterated his previous heritage concerns and stated that "that this proposal would be detrimental to the historic integrity of Winchester" (paragraph 27).

Outcome

The promotion of an urban extension on the north side of Winchester over a prolonged period (15 years) was driven by the need for housing provision. Heritage issues at the city scale were compromised to the extent that the landscape setting of the city would have been superior without the scheme. However, the detail of the proposal was considered in great detail, including an agreement between the City Council and the developer, Cala Homes, to a layout and a design aimed squarely at creating a new modern inner suburb for Winchester comparable to others in its compactness and relationship to the city centre. Over a long period officers have worked hard to achieve a scheme sympathetic to the spirit of Winchester, and councillors too have had sufficient faith to continue promoting an urban extension rather than select other choices. A detailed design code has now been agreed, there will be a sharp urban edge, and a green wedge towards the city centre will be retained east of the railway line. More controversially, the housing will be knitted in to the radial road system by a realignment of the Andover Road through the scheme, with strict speed restrictions. The Highways Authority and Planning Inspector were persuaded of the merit of this, though the Secretary of State still considered that the proposed downgrading of the Roman Road would be detrimental to the historic integrity of Winchester. Rather than create a largely free-standing new community, effort has been put into making the extension feel like part of the city, comparable to other parts of the city.

Lessons learnt

The first key point learnt is the importance of understanding what matters in the heritage of the city: in this case, the compact form of the city, a sharp urban edge, and the feeling that housing areas are close and accessible to the city centre mattered most. These mattered more than preserving a green wedge and the landscape setting beyond, noting that this was one of the few directions for growth which did not have intervisibility with the historic core. Authorities should establish clearly what it is that really is special, not only in the extension area but in the city as a whole. What aspects of the landscape should the urban extension most respect, and how can this best be done? A second lesson is to work closely with others so that they too respect the town, such as the Highways Authority. The transparency of the City Council's proposals and engagement over the years were appreciated, even by those who took other views. A third lesson is that even where development will take place that will compromise historic landscape setting, constructive discussions with the developer through the whole process can result in a scheme that better reflects the characteristics of the town or city and achieves more benefits.