

## ENGLISH HERITAGE

Issue No. 3  
Rep Ref: English Heritage

### GLOUCESTERSHIRE WASTE CORE STRATEGY EXAMINATION INSPECTOR'S HEARING English Heritage Representation – 5th January 2012

#### Topic Paper for Issue 3 – (Thursday 2<sup>nd</sup> February – session)

*Response to Issue 3 – Whether the CS is consistent with National Policy; Question 4: Policy Omission.*

*3.5 Would the CS be unsound without inclusion of reference either in policies or by new policy of PPS5 policy HE2.3?*

English Heritage considers that in order to provide a quality strategic framework for managing waste in Gloucestershire, there needs to be a robust and transparent policy for the historic environment supported by base-level evidence to inform this process. We consider that the current CS document does not meet this requirement or is in accordance with the PPS5 guidance and is therefore putting the CS at risk of being Unsound.

Whilst we acknowledge that within the CS, Key Issue 3 does refer to the historic environment, later references are subsumed with the natural environment issues to such an extent that there is a clear imbalance within the CS that should be addressed in order to meet the guidance imbedded in PPS5 and to make the CS Sound.

For example we draw attention to **Strategic Objective 5- Minimising Impact**. Whilst this is a laudable objective in promoting high quality sustainable design and protecting national and local areas of landscape and nature conservation importance, there is no reference to any designated heritage asset of national or local importance being protected as a strategic objective. We contend that due to this omission, the related policies WCS11 and WCS12 are also devoid of any historic environment references as there is no strategic objective to inform and guide the policy.

We maintain without a specific policy on the historic environment, or any modification to an existing policy to include the historic environment, this Core Strategy remains Unsound. Paragraph 2.8 on page 14, clearly outlines the high level of designated heritage assets within the County and the presence of a large amount of archaeological remains both in standing monuments and underground archaeology. This is sadly not reflected in either of the policies or objectives of the CS.

WCS12 is the most appropriate policy for the historic environment to be located. The policy as it stands fails to recognise the balanced nature of the definition of sustainable development. Its emphasis on the natural environment fails to acknowledge or provide any protection for the county's historic environment to the

national planning policy required standards. Without any policy reference, we are concerned that the significance of the historic environment specific to the CS objectives will be much reduced in weight.

In response to paragraph 4.251, that suggests there is no need for a separate policy as it will repeat government guidance, we contend that there **are** specific factors relevant to this CS that would justify a variation to the policies. The CS should reflect overarching government guidance on the historic environment by including a specific policy, or reference to the historic environment, that is locally relevant and reflects the specific special qualities inherent in the historic environment of Gloucestershire. In doing so it is endorsing government policy and recognising the historic environment as a strategic priority for the County just as it is doing the same for the natural environment.

#### The NPPF

With the recent publication of the National Planning Policy Framework there is also a need to address this document within the context of this stage of the Core Strategy. The Government's Objectives for the historic environment and its heritage assets, as set out in PPS5, remain unchanged in the draft National Planning Policy Framework. The draft NPPF includes the core land-use planning principle of protecting heritage assets and makes the protection and enhancement of the historic environment a strategic priority that should be included in Local Plans. The draft further highlights the need to understand and manage the significance of heritage assets as part of plan-making, through the development of conservation strategies by local planning authorities.

Recent guidance from PINS indicates that whilst it is a consultation document and, therefore, subject to potential amendment, nevertheless the NPPF gives a clear indication of the Government's 'direction of travel' in planning policy. Therefore, the draft NPPF is capable of being a material consideration, although the weight to be given to it will be a matter for the decision maker's planning judgment in each particular case. We refer specifically to Paragraph 23- (Local Plans) of the NPPF that recommends:

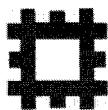
*"Local Planning Authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver: climate change mitigation and adaptation, protection and enhancement of natural and **historic environment** ..."*

English Heritage has formally responded to the consultation on the draft NPPF. In order to assist this Examination a copy of that response is appended to this document (Appendix 1). We advise that the draft NPPF is a material consideration to be taken into account, although, of course, it may be changed to take account of consultation responses. We confirm that until such time as the NPPF is adopted and cancels all PPG's and PPS's, PPS 5 remains the Government's adopted policy in relation to the historic environment and the principal document to use when considering the Gloucestershire Waste Core Strategy.

In conclusion we repeat that due to the significant omission of any policy related to the historic environment within the CS at present the Gloucestershire Waste Core Strategy is UNSOUND.

**Appendix 1 – English Heritage Formal Response to CLG.**

To follow.



## ENGLISH HERITAGE

Mr Alan C Scott	Our ref:	NPPF response
National Planning Policy Framework Consultation	Your ref:	
Department of Communities and Local Government		
Zone 1/H6 Eland House	Telephone	020 7973 3851
Bressenden Place	Fax	020 7973 3001
London		
SW1E 5 DU		

17 October 2011

Dear Mr Scott

### ENGLISH HERITAGE RESPONSE TO THE NPPF CONSULTATION

This letter and its attachments provide English Heritage's response to the consultation on the draft National Planning Policy Framework. Our response is formed by our amended version of the NPPF text, an accompanying commentary, and our Consultation Response Questionnaire.

English Heritage believes that if a small number of changes and additions to the National Planning Policy Framework (NPPF) are introduced, the protection of the historic environment can be maintained at the existing level, which is the stated aim of Government.

Our main concerns are:

- The wording of the historic environment policies section and the wording of the presumption in favour of sustainable development section need to be reconciled so that there is no confusion in interpretation, leading to an unintended reduction in the level of protection for the historic environment.
- The lack of a policy to deal with proposals causing moderate or minor harm to heritage assets.
- Inadequate protection of undesignated but nationally important archaeology in areas where there is a Neighbourhood Development Order.
- Inadequate recognition of the positive contribution the historic environment can make to sustainable development. We would like to see a policy that encourages the viable use of heritage assets, where possible, and to see recognition that the historic environment has a positive role in making characterful and sustainable places.

1 WATERHOUSE SQUARE, 138-142 HOLBORN, LONDON EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001

[www.english-heritage.org.uk](http://www.english-heritage.org.uk)

Please note that English Heritage operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available



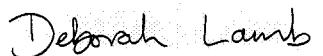
- That the protection of our nationally important historic buildings and sites should be given 'great' weight, to be consistent with the wording for the protection of National Parks and Areas of Outstanding Natural Beauty.

English Heritage believes that all the above concerns can be addressed through a small number of changes or additions to the text and we have made these suggestions on our amended version of the NPPF text and the accompanying commentary.

We have already had useful meetings with both Ministers and DCLG and DCMS officers, and have presented our initial responses to the consultation to them. We look forward to continuing dialogue on the historic environment issues in the NPPF and, in due course, discussion over guidance for the topic.

If you have any queries on details of our response attached to this letter, please do not hesitate to contact us.

Yours sincerely



Deborah Lamb  
Director of National Advice and Information  
E-mail: deborah.lamb@english-heritage.org.uk



1 WATERHOUSE SQUARE, 138-142 HOLBORN, LONDON EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001

[www.english-heritage.org.uk](http://www.english-heritage.org.uk)

Please note that English Heritage operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available