Stanmore Village, Bridgnorth - Shropshire Local Plan Review (SLPR) on the 'Regulation 18' Pre-Submission Draft
Site Comparison: Heritage Matters
edp5653_r008b

1. Introduction

1.1 This document has been prepared by The Environmental Dimension Partnership Ltd (EDP) on behalf of the Stanmore Consortium. It forms a technical note comparing the heritage issues arising from development of Land at Stanmore Village, Bridgnorth and Land at Tasley, Bridgnorth, both of which are being put forward for potential allocation within the Pre-Submission Draft of the Shropshire Local Plan Review as new Garden Villages.

1.2 The note has been prepared in response to Shropshire Council's '*Summary of the Assessment of Garden Village Proposals in Bridgnorth*' issued in August 2020 which compares the two sites and summarises the assessment process completed by the Council, drawing conclusions on the suitability of the two sites for residential development and concluding that the Tasley site is more acceptable in terms of its potential impacts upon the historic environment. This conclusion is considered to be incorrect and the note examines the validity of the Council's assessment and the robustness of the site assessments that underpin the Council's decision making.

1.3 In this respect, it includes a review of the existing Heritage Desk-Based assessment for the proposed Tasley Village, Bridgnorth produced by Pegasus Group in April 2020 and references EDP's updated Archaeological and Heritage Technical Note (edp5653_r001c) produced in September 2020.

1.4 The review was informed by a site visit which took place in September 2020 during which the Tasley site was visited from accessible Public Rights of Way (PROWs) and the Stanmore site revisited.

2. Tasley Garden Village Bridgnorth

2.1 The site comprises c.129 hectares (ha) of primarily agricultural fields, as well as woodland, watercourses and buildings associated with Footbridge Farm, The Leasowes and Roundthorn Farm. The desk-based assessment supporting the proposal and undertaken by Pegasus Group describes the proposal as comprising the:

'..creation of a sustainable community of up to 1,050 homes, a minimum of 16 hectares of employment floorspace along with a local centre, including community facilities and a new primary school up to 2038. A minimum of 38 hectares of further land would be available to meet the development needs beyond 2038'.

2.2 The purpose of the assessment is stated as being to provide:

'...information with regards to the significance of the historic environment and archaeological resource to fulfil the requirement given in paragraph 189 of the Government's National Planning Policy Framework (the NPPF1) which requires: "an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting." In order to inform an assessment of the acceptability of the scheme in relation to impacts to the historic environment and archaeological resource, following paragraphs 193 to 197 of the National Planning Policy Framework (NPPF), any harm to the historic environment resulting from the proposed development is also described, including impacts to significance through changes to setting. As required by paragraph 189 of the NPPF, the detail and assessment in this Report is considered to be "proportionate to the asset's importance"'.

2.3 The methodology section of the Pegasus assessment notes that:

'Due to measures being put into place in order to contain coronavirus, heritage consultants at Pegasus Group have been unable to undertake a site visit; assess archival sources held at the Shropshire Archives; or view historic aerial photographs or documentary sources held at the Historic England Archive in Swindon'.

2.4 As such, the assessment, rather than being informed by site visits, has relied upon photographs taken to inform the Landscape and Visual Impact Assessment (LVIA) which were taken in relation to the human experience of the site's designated and non-designated heritage assets, rather than examining their interrelationships with the site and their wider historic environment.

2.5 It is on the basis of these photographs that the assessment reaches its conclusions regarding impacts. However, in the acknowledged absence of actual site visits, the robustness of the impact assessments should be treated with caution.

2.6 The Pegasus assessment identifies that two Grade II listed buildings are located within the site boundary and these comprise *The Leasowes* (LB1294006) and the *Former Farmhouse at the Leasowes* (LB1367565).

2.7 The map regression exercise undertaken in the assessment identifies the changing morphology of both buildings and their associated structures. The assessment does not identify if and to what extent contemporary structures survive within the curtilage of both listed buildings such that these may also be listed under the terms of the 1990 Act. This needs review and site visits made to establish if and to what extent additional buildings within these farm complexes may be curtilage listed.

2.8 As such, the number of 'listed' structures may be far greater than suggested by the assessment, making the focus of any setting assessment too narrow and potentially therefore any conclusions drawn understated and misleading.

The setting of the Grade II listed building Former Farm House at the Leasowes (LB1367565)

2.9 Beyond the establishment of the significance of the listed buildings within the site, the setting assessment presented in the Pegasus report relies heavily on views. Any assessment of the non-visual aspects of the farmhouse's setting that might contribute to their significance is limited, potentially unbalancing the conclusions reached.

2.10 Whilst it is correct that views of the farmhouse from the fields in the wider site are limited by adjacent trees and by the presence of large modern farm buildings, the farmhouse can still be seen (for example from the higher ground to the south-east; **Image EDP 2.1**) and distinguished as an older, residential building amongst the group at the farm. In such views it is experienced from adjacent farmland as a historic building set at the centre of a large modern farm, to which it was evidently the predecessor, and is part of a group of functionally and historically related buildings within which it represents the principal dwelling.

Image EDP 2.1: View towards Leasowes Farm House from the south-east and illustrating how the farmhouse is visible within the group of mostly modern farm buildings and that it can be distinguished as a historic building.

2.11 The modern farm clearly possesses and exhibits an ongoing functional relationship with the surrounding farmland which in turn reflects a continuation of the historical relationship between the farmhouse and the surrounding farmland.

2.12 As such, the building's significance as a historic, post-medieval farmhouse can be appreciated through this ongoing association with a working farm and the surrounding farmland and, from certain viewpoints, the building continues to be experienced and appreciated within this setting; as a farmhouse within an agricultural landscape with which it has a close historic and functional association and has done since at least 1839, when it was depicted on the Tithe Map of the Parish of Tasley and, probably long before, as the Historic England (HE) citation dates the building to the 17th century.

2.13 In this respect, it is very likely that, following a fully-considered assessment with full access being available to all of the Tasley site by an experienced heritage consultant, it would be concluded that much of the farmland within the site, not just *'the fields in the closest proximity to the building'* represent a part of the setting of the listed building that contributes to its significance as a designated heritage asset.

2.14 Furthermore, given the ongoing functional relationship between the farmhouse, the working farm and surrounding agricultural land, within which the farm is experienced, a greater value should be placed on the contribution made to the listed building's significance from the associated farmland within the site and, the loss of such land should therefore result in a greater effect than harm at the '*lower end*' of the spectrum of '*less-than substantial harm*' as assessed in the Pegasus report.

***The setting of the Grade II listed building The Leasowes* (LB1294006)**

2.15 Regarding the 19th century residence *The Leasowes,* the Tasley report states that opportunities to see the house from within the site are limited and observes that, from the PROW to the south, its '*architectural interest cannot be identified at a distance*'. It is contended that this not the case as, in views north from the PROW (**Image EDP 2.2**) the house's Georgian architectural style is apparent and it is quite prominent, being taller than the farm buildings in the foreground.

2.16 In this respect, it has a dominance over the adjacent farm buildings suggesting a hierarchy within the group, with the later, grander 19th century residence rising above the farm and, especially given its lack of substantial vegetation boundary to the south, suggesting that it was intended to be seen in views from the south and in all probability the south-west too.

Image EDP 2.2: View towards The Leasowes from the south/south-east illustrating the visibility of the house, its prominence above adjacent buildings and that its architectural quality can be experienced, and also appreciated, from a distance.

2.17 Whilst the building is a residential dwelling and not a farmhouse; given its location close to the farm, the dominance of the building as described above, and that the house was evidently built by the Acton's of Gatacre on taking ownership of the farm, there is clearly a strong historical association between the 19th century house and the working farm. Plate 8 of the Tasley report, identifies the extent of the historic landholdings associated with the *Former Farm House at the Leasowes*. Given that *The Leasowes* is closely linked with the historic development of the nearby farmstead, on account of this association, these fields must also be considered to form part of the setting of *both* buildings.

2.18 Although the Tasley report does not explain how these buildings as a group are experienced in the landscape, it is apparent that the 19th century house can be experienced alongside the earlier farm and that a hierarchy can be appreciated from at least some of the farmland within the site. Furthermore, they are clearly located within an agricultural landscape which, at least in part, has been closely associated with the economic fortunes and historic context of both listed buildings over time. As such, it is this relationship to the agricultural landscape that underpins the significance of both listed buildings and this prevails, regardless of the ability to observe the buildings from roads or footpaths, as detailed in the Pegasus report. Quite clearly, this element of the listed building's heritage significance will be entirely altered and irrevocably damaged by the development here.

2.19 Whilst it is acknowledged that there is already development allocated within their setting, the proposed allocation would have a cumulative effect, in that it would close off the last remaining connection with the open farmland landscape to the south-west and hem these farm buildings in on all sides with modern built form. It is noted that, with respect to cumulative change. *The Setting of Heritage Assets* (HE 2017) set outs that:

'Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting…'.

2.20 It is currently still possible to experience and appreciate both listed buildings as elements of an historic farm set within an agricultural landscape which is functionally related to them, both historically (from at least 1839) and in the present and, within which they remain separated from the built form of Bridgnorth. It is also possible to appreciate *The Leasowes* from within the site, from this associated farmland, as a stage in the evolution of the group of buildings in which a grander residence was introduced, evidently reflecting the changing occupancy and fortunes of the farm and thus its historic interest.

2.21 Given these observations, it is highly likely that, following a comprehensive assessment of these listed buildings by an experienced heritage consultant, with full and detailed access to the site, the contribution made to the significance of both listed buildings by the farmland within the site would be reviewed and refined. It is likely that the loss of this land would conclude a greater effect than harm at the '*lower end*' of the spectrum of '*less-than substantial harm*'.

The setting of the non-designated farmhouses within the site

2.22 Within the wider site it is proposed that both Round Thorn Farm and Footbridge Farm would be demolished. Neither are listed buildings, but both structures are identified as non-designated heritage assets by inclusion on the Shropshire Historic Environment Record (HER).

2.23 To date there has been no assessment of their heritage significance or how the site contributes to their significance in terms of their setting. Clearly, they have been in existence since at least 1839 (Plate 8 of the Pegasus assessment) and could potentially be of earlier date. The omission of an assessment of these two assets may well mean that the conclusion of the extent of harm resulting from development of the site overall is understated because the level of harm arising from their demolition has not been considered.

2.24 Observations made from PROW and the A458 on the northern edge of the site illustrate that both of these historic farmsteads are set within a complex of outbuildings, including modern farm buildings and older outbuildings (**Images EDP 2.3** and **2.4**). It is evident that there remains a functional relationship between both farms and the surrounding agricultural land; for Footbridge Farm, a large tract of arable land and, for Round Thorn, a cluster of small pastures used for livestock. In this respect, for both farms, the historic farmhouse represents the oldest

element in the group of buildings. Their presence and the experience of them from adjacent land allows for an appreciation of the time depth within the complexes and equally the historic, functional association between the working farms and the surrounding land.

Image EDP 2.3: View towards Round Thorn Farm from the north-east illustrating the historic farmhouse set within a group of functionally and historically related buildings and fields.

Image EDP 2.4: View towards Footbridge Farm from the north illustrating how the farmhouse (of which only the roof is visible above a hedgerow) is set adjacent to functionally related buildings and associated farmland.

2.25 As such, it is considered that the associated farmland surrounding the two farmsteads forms the wider setting of these assets and makes a contribution to their significance. As stated above, the Pegasus report has not given due consideration to the significance of these heritage assets, nor the contribution made to their significance by their settings which is apparent when visiting the site. A comprehensive assessment with full access to the farms would enable a robust review of the assessment's conclusions in this regard and no doubt result in an increased level of harm being identified in respect of the proposals altogether.

3. Review of the '*Summary of the Assessment of Garden Village Proposals in Bridgnorth*' issued in August 2020

3.1 This paper, issued by Shropshire Council, presents a summary of a detailed site assessment process, which forms part of the wider Sustainability Appraisal of the Shropshire Local Plan, in order to identify the allocations proposed for inclusion within the Pre-Submission Draft of the Plan. It summarises the assessment process completed by the Council, insofar as it relates to the two sites proposed as 'Garden Village' urban extensions at Bridgnorth; comprising Stanmore Village and Tasley Garden Village.

3.2 The site assessment process summarised in the paper includes consideration of a range of factors and subjects. This current review focusses only on the aspects related to Heritage, detailed at Paragraphs 24 and 25 and in the paper's Conclusion.

3.3 Paragraphs 24 and 25 simply state some of the facts regarding the heritage interest within the two sites. The paper concludes that the Tasley site represents the more appropriate location for a draft allocation at Bridgnorth. It then sets out the various factors that led to this conclusion. With regard to heritage matters it states that:

'The land at the 'Garden Village' at Tasley contains several heritage assets, including two Grade II listed buildings. A Heritage Assessment provided by the Promotors indicates that less than substantial harm would arise to the significance of these designated heritage assets as a result of the changes that would occur to their settings. Because Sections 66(i) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the tests set out in Paragraphs 193, 194 and 196 of the Framework are therefore engaged, the Council is required to place great weight upon to their conservation. However, whilst this requirement is acknowledged, it is considered that through appropriate design and layout of development and incorporation of effective Green Infrastructure, impacts on these assets can be minimised. Further, it is considered that the significant public benefits of meeting the housing needs of Bridgnorth and its hinterland would outweigh the harm that would be caused to the significance of the listed buildings. Whilst it is also considered that the land at the 'Garden Village' at Stanmore could mitigate impact on heritage assets, this is considered more challenging particularly in relation to the Hermitage Scheduled Monument – a designated heritage asset of the highest significance, given the location of this asset.'

3.4 This conclusion is clearly flawed for three reasons discussed below and should be reviewed and revisited before moving forward with the Plan.

3.5 Firstly, planning legislation and policy is misrepresented in terms of the onus placed on potential harm to a Scheduled Monument in comparison to potential harm to a Listed Building arising from change within their settings.

3.6 Secondly, the Council has misinterpreted the concept of 'less than substantial harm' in terms of the Government guidance set out in the NPPF.

3.7 Thirdly, because of the mis-interpretation of these two points, the decision to favour the Tasley Garden Village is flawed because of the lack of consideration of alternative locations that would deliver similar or comparable development, but in fact result either in less or no harm to heritage assets instead.

3.8 Prior to this discussion, the following paragraphs summarise the potential heritage impacts of the two competing sites.

Stanmore Village, Bridgnorth

3.9 With reference to the Archaeological and Heritage Technical Note (EDP, 2020 - edp5653_r001d) it has been shown that the Stanmore Village site contains a single '*designated*' heritage asset, the Scheduled Monument *The Hermitage (NHLE: 1004782),* part of which is located at the north-western edge of the site.

3.10 Whilst this represents a constraint to development, the details described in the HE citation indicate that the monument comprises the caves beneath the far north-western extent of the site and their entrances, located beyond the site boundary to the west, and so this is not ultimately considered to be the case.

3.11 There are no known above ground remains related to the monument within the site and the cave entrances are located within Hermitage Hill Coppice, beyond the site boundary to the west. This woodland is proposed to be left undeveloped.

3.12 The cave entrances are well-contained within woodland and open out to the west, away from the site. Due to its west facing aspect and surrounding woodland, the Scheduled Monument cannot be experienced from the land to the east within the site and neither can its archaeological and historic interest be appreciated from the land at the site.

3.13 There *is* an historic connection with the land at the site, insofar as a former spring was located in the north-western part of it, but this association cannot be perceived as the well is not extant and the land now comprises a modern arable field adjacent to woodland. As such, the arable fields within the site are concluded as a neutral element of the setting of the asset and make no contribution to its significance one way or the other.

3.14 It is therefore concluded that development within the Site could be accommodated without causing harm (either physically or through change within its setting) to the significance of *The Hermitage* scheduled monument. Indeed, the development presents an opportunity to improve the conservation and presentation of the monument through improved management, which could be secured by condition or S106 obligation. Accordingly, it is reasonable to conclude that development of the site would at least cause no harm to the significance of the monument and could in fact potentially deliver an enhancement.

3.15 Otherwise, the assessment does not identify any harm to any of the designated heritage assets outside the site from its proposed development.

3.16 Furthermore, on the basis of the current information there are no known archaeological deposits or other non-designated heritage assets within the site likely to constrain its development in the manner proposed. Whilst it does contain Hermitage Farmhouse which is considered to comprise a non-designated heritage asset, as per Annex 2 of the NPPF, it is not proposed to demolish the building and instead to retain it within the development as a characteristic feature and also to retain local distinctiveness. The expectation is that there would be a degree of harm arising from the development of the surrounding farmland (changing its agricultural setting), but as the most

part of its low significance is drawn from its physical form and fabric, it is likely that it would be relatively limited and not represent a significant constraint.

Tasley Garden Village, Bridgnorth

3.17 Based on the Pegasus assessment, the site contains two designated heritage assets that would both experience 'less than substantial harm' (as set out in Paragraph 196 of the NPPF) because of the proposed allocation of the site for a Garden Village. The proportion of their significance that is derived from their agricultural setting will be largely destroyed as a result of their long-term separation from the surrounding farming landscape.

3.18 Due to the shortcomings of the assessment, not least of which is the absence of any site visit by an experienced heritage consultant but also no clear understanding of what may be curtilage listed, the statement that this level of harm is at the 'low end of the spectrum' can only be tentative and should be treated with caution.

3.19 In addition to this, the heritage significance of the non-designated heritage assets Round Thorn Farm and Footbridge Farm has not been established. They clearly pre-date 1839 and may have much earlier origins. This requires thorough investigation and assessment, so that the impact of the proposed demolition can be assessed, and to determine if this is an appropriate course of action.

Critique of the Summary paper

3.20 Of course, it is true to say that the NPPF treats Scheduled Monuments and Listed Buildings equally as 'designated heritage assets' and advises that '*great weight*' should be given to their conservation (and the more important the asset, the greater the weight should be). However, there is a **key** difference between them and it is that the statutory protection afforded to them under the relevant Acts of Parliament (underpinning their 'designation' in NPPF terms) covers **only** the physical form and fabric of a scheduled monument, but extends more widely to also to cover the setting of a listed building.

3.21 This is an important distinction because it means that the setting of a listed building receives statutory protection, whereas the setting of a scheduled monument is a matter of planning policy only and not covered by the relevant Act of Parliament.

3.22 In accordance with s66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the planning authority should give '*special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*'.

3.23 The '*special regard*' duty of the 1990 Act has been tested in the Courts and confirmed to require that '*considerable importance and weight*' is afforded by the decision maker to the desirability of preserving a listed building along with its setting and there is a '*strong presumption*' against the approval of development proposals that would harm the setting of a listed building.

3.24 In comparison, the *Ancient Monuments and Archaeological Areas Act 1979* focuses solely on the conservation of a monument's form and fabric, as well as detailing the procedures needed to obtain permission for works which would **directly** impact upon it.

3.25 In comparing the two sites at Stanmore and Tasley; for Stanmore, with suitable design measures in place, it is considered that (at worst) the development could generate a very small degree of harm to the Scheduled Monument as a result of change within its setting, but this is assessed as being unlikely and in reality development would either preserve or even enhance the asset's heritage significance. At Tasley, the applicant's own assessment concludes that development of the site would give rise to less than substantial harm to two Grade II listed buildings.

3.26 Whilst the precise scale of that 'less than substantial harm' can be argued and debated, in does not make much difference for the application of Case Law or policy because in any terms harm would be caused and significance would not be preserved.

3.27 There is a 'strong presumption' against the harm caused to the two listed buildings in law, even if it is clearly accepted that this presumption can be overridden by factors significant enough to do so. Hence, the NPPF requires that there is '*clear and convincing justification*' in any instance where harm would be caused to a heritage asset.

3.28 The Council's assertion that the 'less than substantial harm' to the two listed buildings at Tasley can be outweighed by the significant public benefits of meeting the housing needs of Bridgnorth and its hinterland can only be flawed. Notwithstanding the fact that the harm arising in respect of the two listed buildings is not based on a full and proper assessment of the contribution made to their heritage significance by their farmland setting, the Council has missed an intermediate step in the assessment of that harm by failing to first identify and then assess the alternatives which could deliver the same benefits without resulting in the same degree of harm.

3.29 In other words, the Council has treated 'less than substantial harm' to two listed buildings as if it was a desirable outcome, when really the legislation and planning policy is clear in highlighting that harm to heritage assets should be avoided where possible and minimised otherwise.

3.30 So, in choosing between two development proposals that would deliver the same public benefits, the one which results in least harm to heritage assets should be preferred. It is therefore clearly untenable for the Council to contend that there is 'clear and convincing justification' for the site at Tasley to moved forward for allocation and development if there is an alternative proposal on the table that could deliver the same benefits without causing the same degree of harm to the historic environment.

3.31 It is contended that the Stanmore Village site provides precisely that alternative scenario, as it would deliver comparable benefits and result in less harm to heritage assets.

3.32 EDP's assessment does not identify harm to any listed building, nor in fact any type of designated heritage asset, located outwith the site's boundary, as a result of its proposed development, and indeed makes it clear that harm to the significance of the fabric of the scheduled monument is

entirely avoidable, whilst harm arising from change to its setting is unlikely and can be balanced against the potential enhancements which can be delivered in terms of management etc.

3.33 Therefore, in terms of the impact of development on the historic environment, it is concluded that Stanmore represents an altogether better proposition than Tasley.

4. Recommendations and Conclusions

4.1 This review has highlighted that the assessment set out in the *Tasley Garden Village, Bridgnorth, Heritage Desk-Based Assessment* (Pegasus Group, 2020) is not robust due to the site having not been visited by an experienced heritage consultant.

4.2 The report does not assess the potential for curtilage listed elements at the two Grade II listed buildings within the site, does not fully assess the contribution made to the significance of these assets by their settings and the heritage significance of both the non-designated heritage assets Round Thorn Farm and Footbridge Farm has not been properly established. As such, the report's assessment that the potential level of harm to the significance of the two listed building from the site's development would be at the 'low end of the spectrum' of 'less-than-substantial harm' can only be tentative and should be treated with caution.

4.3 In its *Summary of the Assessment of Garden Village Proposals in Bridgnorth* (August 2020), the Council accepts the 'less-than-substantial harm' to the two Grade II listed buildings from the development of the Tasley site, when the NPPF is clear in saying that harm should be avoided insofar as possible and justified where it is not avoidable, and then, assumes that the public benefits of development will outweigh the harm caused to those listed buildings without precise understanding of the scale of harm which would result.

4.4 Given the limitations of the Pegasus assessment, it is arguable that the degree of less-than-substantial harm is not properly established (neither are other heritage impacts within the site) and could, in fact, be quite severe to both listed buildings. A close comparison with the Stanmore Village site suggests a lesser degree of impact (if any) to designated heritage assets from the proposals and thus, there is an opportunity at Stanmore to achieve development which avoids an equivalent impact upon heritage assets.

4.5 It is recommended that to fully inform the decision making process associated with the proposed allocation of Tasley Garden Village site for housing within the Shropshire Local Plan it must be subject to a more detailed and thorough assessment, including a site visit by an experienced heritage consultant. This should focus particularly on setting matters within and beyond the site boundaries but should also pay particular attention to the assessment of the significance of the non-designated built heritage assets within the site including any contribution made by their settings in that respect.

4.6 It is also recommended that, following the re-assessment of the Tasley site, the Council re-runs the Sustainability Appraisal exercise as it relates to heritage matters, in order to compare and

contrast the Garden Village site promotions again with full consideration for the heritage impacts of each proposal and with reference to heritage legislation and planning policy.

4.7 As things stand, it is difficult to see how the Council believes that the Tasley site performs better in heritage terms than the Stanmore proposal. It is similarly challenging to understand how the allocation of the Tasley site within the Local Plan could meet the advice set out in the Framework and be policy-compliant in the knowledge that there is no clear and convincing justification for the harm to the two listed buildings located within its boundaries.