



Historic England

The Planning Strategy Team
Stroud District Council
Ebley Mill, Stroud
Gloucestershire, GL5 4UB
Email: local.plan@stroud.gov.uk

21 January 2019

Stroud District Local Plan Review Emerging Strategy Paper November 2018

Dear Sirs

Thank you for providing Historic England with an opportunity to consider and respond to the consultation of this Paper. My apologies for the delay in this response.

Question 1.0a The document makes reference to 5 key issues having regard to *previous views and national policy*. Unfortunately no reference is made to Stroud's historic environment, cultural heritage and associated local distinctiveness. Due to its social, environmental and economic importance, national policy at paragraph 185 of the NPPF requires local plans to set out a positive strategy for the historic environment. Could we recommend the Plan considers explicit reference to the historic environment as a key issue for the Plan to address. Good Practice Advice in Planning: 1 The Historic Environment in Local Plans (2015) may help as will, I am sure, Stroud District Council's recently adopted Heritage Strategy (SPA) - "*for the enjoyment and positive management of Stroud District's historic environment and heritage assets*".

<https://historicengland.org.uk/advice/planning/plan-making/>

Question 1.0b The Local Plan should set out how it intends to ensure it can deliver a positive strategy for the conservation of the historic environment (protection and enhancement). The **Making Places** section of the Plan provides a convenient opportunity to illustrate such matters.

Question 2.1a The emerging strategy should consider how and to what extent the historic environment contributes to the District's local economy and how this should be acknowledged and supported by the Plan.

<https://historicengland.org.uk/research/heritage-counts/heritage-and-economy/>
<https://historicengland.org.uk/research/heritage-counts/2018-heritage-in-commercial-use/>

Question 2.1a Historic England considers that the role of the historic environment in the economy of the District may have been underappreciated.

Question 2.2a/b Historic England acknowledges and welcomes the document's recognition of the value of local character as a unique selling point (USP). We would emphasise the potential important role of role of Stroud's historic environment in the future role of local centres.



Historic England, 29 Queen Square, Bristol BS1 4ND
Telephone 0117 975 1308 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

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



<https://historicengland.org.uk/advice/planning/historic-towns-and-high-streets/>

Question 3.1a Historic England welcomes the Vision and reference to Stroud's heritage and commitment to nurturing the District's high quality landscapes, historic and cultural heritage, from the arts and crafts, through to the Cotswold Canals and wool and cloth mills.

Question 3.2a. Historic England welcomes Objective SO6

Question 4.2, 4.3, 4.4 It may be helpful if Stroud DC were to prepare a topic paper that sets out the relative implications of the options for the historic environment. For example, the emerging strategy indicates a number of large scale allocations with potentially considerable negative heritage implications. Might small scale incremental organic settlement growth be more appropriate and echo the District's historic character?

Question 5 Historic England would encourage the mini visions to illustrate the Plan's positive strategy, including enhancement, for the historic environment (NPPF Paragraph 185).

Question 6.1 The District Council should ensure that it is able to demonstrate the following.

- Have you identified and assessed the significance of any heritage assets that may be affected by any proposed allocation, including the contribution made by setting (NPPF para.190)?
- Have you identified what impact any potential allocation may have on their significance?
- Would any proposed allocation sustain and enhance heritage assets in a manner appropriate to their significance (NPPF para.184)?
- Have you had due regard to legislative requirements e.g. S66 and 72 of the Listed Buildings and Conservation Areas Act 1990?
- Have you attached great weight to the conservation of affected heritage asset's (NPPF para.193)?

The District Council should be able to demonstrate how its positive strategy for the historic environment (NPPF paragraph 185) has been informed with perhaps a heritage topic paper setting out the issues and proposed response.

<https://historicengland.org.uk/advice/planning/plan-making/>

I hope our comments are useful, even if slightly late (apologies). If it may be helpful to meet to discuss the Plan's progress, do please get in touch.

Sincere regards

██████████

██████████ BaHons DipUD MRTPI
Principal South West and West Midlands Historic Environment Planning Adviser
Planning Group, Historic England
██████████ [@historicengland.org.uk](mailto:██████████@historicengland.org.uk)

