

COTTINGHAM NEIGHBOURHOOD PLAN: 2017

STRATEGIC ENVIRONMENTAL ASSESSMENT – HERITAGE ISSUES

The purpose of the Strategic Environmental Assessment for the Cottingham Neighbourhood Plan

This Strategic Environmental Assessment (SEA) has been created at the request of Historic England, and will serve as a supporting document to the Cottingham Neighbourhood Plan. It seeks to ensure that policy within the Cottingham Neighbourhood Plan effectively addresses heritage issues. This document will complement the Sustainability Appraisal of the East Riding Local Plan (ERLP) and policies within the recently adopted Local Plan itself.

The Cottingham Neighbourhood Plan was submitted to the East Riding of Yorkshire Council for SEA screening in 2015. The plan covers the Civic Parish of Cottingham, an area with a population of approximately 18,000, and, when approved, will serve to form a statutory development plan, holding equal legal weight to the ERLP (2016).

This document covers aspects of heritage in the parish, with particular focus on issues relating to the conservation area, listed buildings, scheduled ancient monuments and non-designated heritage assets. This has also been explored in depth in the Sustainability Appraisal of the Strategy Document for the East Riding Local Plan, and also in the NPPF (2012) which states that we should ‘conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations’.

Although there is no specific reference to heritage issues in Cottingham, the ERLP SA document identifies the historic environment as one of the East Riding’s greatest assets and suggests that they should be used to reinforce local distinctiveness and create a sense of place, in accordance with policy **ENV3** of the ERLP. This policy addresses the management of conflict between pressure for development and the preservation of heritage assets.

The Importance of Heritage in Cottingham

Heritage plays an important role in Cottingham as much of the village lies within a conservation area, covering approximately half of the area included within the designated development limits. This, combined with new development needs in the area, means that measures should be put in place for the management of heritage assets through the planning system.

In response, policy **GP2** of the Neighbourhood Plan requires that the design of new development should take full account of the historic character of the Cottingham Conservation Area, and other heritage assets within the Neighbourhood Plan Area and that landscape setting, open spaces, key views and vistas, and unlisted buildings etc., identified as contributing to the significance of the conservation area, should be maintained, in accordance with the East Riding Local Plan.

The Neighbourhood Plan seeks to ensure that new development adopts similar densities and street form to nearby existing development within the conservation area and that the aesthetics of the village are maintained. This is to be achieved with reference to wide-ranging Design Guidance in Part 2 of the Cottingham Neighbourhood Plan covering topics such as building frontages, materials, colours, and green space, all of which should help to preserve the architectural and historic interest of the village.

Applying the Design Guidance to new developments should ensure that local distinctiveness and character are maintained and that due attention is paid to the duty to preserve and conserve the

character and appearance of the conservation area and the setting of listed buildings and Scheduled Ancient Monuments.

Cottingham Neighbourhood Plan Policies

The issue of heritage was considered at all appropriate stages in the Neighbourhood Planning process.

Policy **GP1** seeks to ensure that all sites identified for future development are developed in accordance with the principles set out in the Concept Statements contained in the Neighbourhood Plan, while Policy **GP2** seeks to improve the overall quality of new design within the Neighbourhood Plan area.

Policy **GP10** is also of importance as referral of major applications to the Yorkshire Design Review Panel should ensure that proposals on allocated sites are submitted - and subsequently approved - in a form that is appropriate to their surroundings.

The site allocations at **COT-D**, **COT-E** and **COT-J** are all located within the Cottingham Conservation Area and are within the setting of listed buildings, and the policies covering these sites have evolved with these considerations in mind. Heritage issues, including non-designated assets, in relation to these sites have been explored in a strategic context with national and local considerations in mind: -

COT-D(1 and 2) lies inside the conservation area, near to the Grade II* Lawns student accommodation blocks and the Baynard Castle Scheduled Ancient Monument, and also contains Ferens Hall, an unlisted building of character together with a significant number of fine specimen trees. The NP recommends that formal arrangement of the existing architecture of Ferens Hall should be incorporated into any proposed new development, in order to maintain the historic character and appearance of the conservation area and the setting of "The Lawns" listed buildings.

COT-E also lies within the conservation area and is located in close proximity to the Grade I listed heritage asset of St Mary's Church, towards which views and vistas should be maintained to preserve its setting, and the character and appearance of the area. The Concept Statement for Cot-E also seeks to preserve the setting of the Grade II station buildings on and adjoining the site to maintain the historic character and appearance of the village.

COT-J is an important site within the village centre, and whilst Needler Hall is not a listed building, it is an attractive historic building and the Neighbourhood Plan seeks its preservation as a non-designated heritage asset, with new development being required to enhance its appearance and setting. A further listed building on King Street, adjoining the site, also needs to be considered. These principles are clearly set out in the Concept Statement for Cot-J.

COT-A lies outside of the conservation area, but is an important site due to its proximity to non-designated heritage assets. The old stable block and the forge, whilst not listed, have enough architectural merit to warrant preservation, and therefore should be incorporated into new development, as stated in the Concept Statement for Cot-A.

Area policies **AP1**, **AP2** and **AP3** concern the Market Green, which lies at the heart of the conservation area. The Market Green area is also significant from a heritage perspective as it borders the Council Chambers, which is a non-designated heritage asset with significant architectural merit that, along with the existing trees to the south of the green, add to the quality of the Cottingham Conservation Area. In accordance with **AP3**, the Civic Hall should be retained for the

purpose of maintaining the character of the area. Policy **AP1**, which seeks enhancement of the Market Green area, should also serve to increase the aesthetic qualities of the conservation area.

Assessment of the Cottingham Neighbourhood Plan polices against heritage assets

| POLICIES | IMPACTS | | | |
|----------|--------------------------|------------------------------------|-------------------------|---------------------------------------|
| | <i>Conservation Area</i> | <i>Scheduled Ancient Monuments</i> | <i>Listed Buildings</i> | <i>Non-Designated Heritage Assets</i> |
| GP1 | ✓ | ✓ | ✓ | ✓ |
| GP2 | ✓ | x | ✓ | ✓ |
| GP3 | ✓ | x | x | x |
| GP4 | x | x | x | x |
| GP5 | ✓ | x | x | x |
| GP6 | x | x | x | x |
| GP7 | x | x | x | x |
| GP8 | x | x | x | x |
| GP9 | x | x | x | x |
| GP10 | ✓ | ✓ | ✓ | ✓ |
| AP1 | ✓ | x | x | ✓ |
| AP2 | ✓ | x | x | ✓ |
| AP3 | ✓ | x | x | ✓ |
| AP4 | x | x | x | x |
| COT-A | x | x | x | ✓ |
| COT-C | x | x | x | x |
| COT-D | ✓ | ✓ | ✓ | ✓ |
| COT-E | ✓ | x | ✓ | x |
| COT-F | x | x | x | x |
| COT-J | ✓ | x | ✓ | ✓ |
| COT-M | x | x | x | x |

| KEY | |
|---------------------------------|-------------------------------------|
| ✓ = issue likely to be material | x = issue not likely to be material |

ALTERNATIVE STRATEGIES

The consideration of alternatives is an important aspect of the SEA process to test the adopted strategy against other, potentially more beneficial approaches.

In the present case, the following potential alternative strategies have been assessed in relation to heritage issues: -

- (a) No policies or design guidance relating to heritage issues
- (b) Heritage issues only considered in relation to allocated sites
- (c) Heritage issues in design guidance only
- (d) Heritage issues covered in separate policy rather than within Policy GP2 “Design Quality”

No policies or design guidance relating to heritage issues:

This approach would result in heritage issues arising from future development in the Neighbourhood Plan area being assessed against the policies in the NPPF and the ERLP alone.

Whilst this approach mirrors the situation in the rest of the East Riding, it denies the Neighbourhood Plan Area the additional benefits likely to arise from the Design Guidance included in Part 2 of the Neighbourhood Plan which is a fundamental aim of the Neighbourhood Plan process as stated in Section 4 of the plan (Aims and Objectives).

Without the current references to heritage issues in the Neighbourhood Plan (at Policy GP2 and in the Design Guidance) the plan would fail to deliver on an important aim of the Neighbourhood Planning process as expressed and supported by local residents.

Alternative (a) is, therefore, not considered to be a suitable option.

Heritage issues only considered in relation to allocated sites:

This approach would deny any additional consideration being given to heritage issues on unallocated sites, which as in (a) above, would fail to deliver on an important aim of the Neighbourhood Planning process as expressed and supported by local residents.

Whilst this approach mirrors the situation in the rest of the East Riding, it denies the Neighbourhood Plan Area the additional benefits likely to arise from the Design Guidance included in Part 2 of the Neighbourhood Plan which is a fundamental aim of the Neighbourhood Planning process as stated in Section 4 of the plan (Aims and Objectives).

Alternative (b) is, therefore, not considered to be a suitable option.

Heritage issues in design guidance only:

This approach would be illogical without an accompanying policy statement since there would be no effective means of applying the Design Guidance in design negotiations with regard to future development within the Neighbourhood Plan area.

Whilst the Design Guidance would be available for reference purposes, the absence of a policy to “enforce” it, would significantly reduce its effectiveness and the Neighbourhood Plan would fail to deliver on an important aim of the Neighbourhood Planning process as expressed and supported by local residents with regard to heritage issues.

Alternative (c) is, therefore, not considered to be a suitable option.

Heritage issues covered in separate policy rather than within Policy GP2 “Design Quality:

This approach was one that was carefully considered by the Neighbourhood Plan Steering Group and its advisers and it does potentially offer some positive effects in that it could: (i) Raise the status and awareness of heritage issues; (ii) Assist with future design negotiations, and; (iii) Potentially, improve the character and appearance of the Cottingham Conservation Area.

On balance, however, the Steering Group favoured a more holistic approach to design matters and were reluctant to separate heritage issues from other design considerations in policy terms. In the Steering Group's opinion, good design should be encouraged to incorporate heritage considerations rather than treat them as a separate entity, for instance in relation to renewable energy considerations, although the favoured approach (as set out in Policy GP2), still highlights the importance of heritage issues.

For this reason, alternative (d) was not adopted in the Neighbourhood Plan.

Although no other alternative strategies were considered various combinations of the four alternatives set out above were tested against the aims and objectives of the plan, e.g. (b) with (d) or (c), but none of these combined alternatives were considered to have the potential to deliver the aims and objectives of the Neighbourhood Plan more effectively than the chosen option.

END OF HERITAGE SEA FOR COTTINGHAM NEIGHBOURHOOD PLAN.