

## **Heritage: comments on Joint Local Plan Issues consultation**

Both the Heritage section of the Issues Consultation paper and the technical paper focus almost exclusively on the issue of Stoke on Trent's 'industrial heritage' and on the built environment. Planning is concerned with the use of land, not purely with buildings. The Heritage Lottery Fund, as one of the country's major heritage organisations, is very clear that heritage also concerns the land and natural environment.

The Issues Consultation paper and the technical paper pay all too little attention to the land, landscape and natural heritage of the rural areas covered by the Plan.

### **Stoke on Trent**

SoT has failed to reinvent itself following industrial and economic decline. So long as SoT clings to its 'industrial past' it will not make the hard choices that will allow it to pull itself out of its current state of dereliction, move forward and attract new business and new population. In the past, cities that have failed to reinvent themselves in the face of change have suffered terminal decline and eventual desertion. SoT cannot continue to live in the past. It has a choice to move forward into the future or to die.

### **Choices to be made**

SoT needs to make hard decisions about its 'heritage' and to identify the real jewels in its crown so as to

- (1) get its heritage and cultural offer right and
- (2) enable badly needed business/commercial and residential redevelopment of areas surrounding identified islands of heritage and culture.

Museum curators continually have to make choices because they know that museums cannot keep every old or historical object that is offered to them, and that everything that is old does not have cultural or historical value.

SoT likewise has to make choices about its built environment. It also needs to make choices that remedy the unrelieved industrial blight and 'Detroitness' of SoT. Above all, it needs to recognise that 'legacy' is not the same as 'heritage'. SoT's industrial legacy is a millstone round its neck. SoT needs to distinguish between the majority of its legacy, which needs to be swept away so that the city can reinvent itself, and the jewels that are its heritage.

The jewels in SoT's crown are:

- The canal and opportunities for waterside living and leisure
- City Museum and Art Gallery, including Staffordshire Hoard

- Gladstone Pottery
- Hanley Park
- Wedgwood Museum
- Ford Hall
- Ready access to Moorlands and Peak District countryside

### **Heritage Commission Report**

SoT needs to be clear about the definition and identification of 'heritage assets' and about the current detrimental influence of its industrial legacy on the city's prospects.

- The Heritage Commission Report is clear about the amount of duplication and redundancy of so-called 'heritage' buildings and the fact that many sites are *not* historic assets.
- '[T]he extent of redundancy and the resultant air of dereliction poses great challenges both for the public image of the city as well in seeking to identify new users' (Technical paper 4.7).
- It is clear from the report that SoT's so-called 'heritage' is a detriment to progress and development and that much of it is beyond use, repair or both.

### **Built environment or heritage?**

The way in which SoT is clinging to its 19th- and 20th-century built environment indicates a misunderstanding that heritage is confined to the built environment and that anything that is old must be heritage. SoT's industrial legacy has left it with a low-quality built environment that needs to be swept away in order for the city to become an attractive and thriving place for business and living.

Heritage also exists and is preserved in three-dimensional objects, photographs, documents, audio and video recordings. SoT must recognise that if it is to move forward a significant proportion of its built 'heritage' and industrial legacy can and must be preserved in the collections of the city's museum, library and archives.

### **NPPF**

The technical paper includes a serious misreading of NPPF para. 139.

Technical paper 1.7: 'Paragraph 139 [of the NPPF] provides guidance on non-designated heritage assets of archaeological interest giving them the equivalent significance in weight as scheduled ancient monuments; therefore they should be considered subject to the policies for designated heritage assets.'

NPPF para. 139: 'Non-designated heritage assets of archaeological interest *that are demonstrably of equivalent significance* to scheduled monuments, should be considered subject to the policies of designated heritage assets.'

Therefore, for any non-designated heritage assets in SoT to be considered subject to the policies of designated heritage assets it would first have to be *demonstrated* that they were *of equivalent significance* to scheduled ancient monuments.

### **Attracting population**

Families with children want to live in urban and central locations so as to be close to facilities that families need the most – shopping, education and leisure and cultural facilities. European studies have found that higher-income professional families are attracted to live in historic urban areas, including the most central locations, on the basis of the historic offer and high-quality leisure and shopping and cultural facilities. The same studies have found that people in the creative industries are also attracted to town-centre living in historic urban areas on the basis of the historic, cultural, social and business networking offers. SoT has a strong creative make-up based on the output of the local art schools and Staffordshire University's film school and needs to look seriously at making itself attractive to young creative professionals.

### **SoT or Six Towns?**

SoT needs to decide whether it wants to be the city of Stoke-on-Trent or the Six Towns. If the Six Towns,

- a distinctive local identity, cultural offer and economy needs to be developed in each town
- quality historic buildings need to be selected that genuinely contribute to the local environment of each centre and need to be re-invented as prestige business, residential and leisure locations
- each town must have first-rate public transport links to the main cultural and economic centre in Hanley
- each town must have first-rate public transport links to the railway station so as to enable access to the main regional cultural, leisure and shopping centres in Birmingham, Manchester and Liverpool.

### **Newcastle-under-Lyme**

While NuL still has a street market, it has lost its identity as a market town since the closing of its livestock market. A succession of poor planning decisions from the late 1960s onwards have resulted in the as-yet unhalted decline of the town centre. The tackiness of the town centre, its shop fronts

and poor-quality developments such as 1 London Road detract seriously from the aspect of a once-prosperous town centre.

Appearances make it difficult to believe that the town centre is actually a conservation area. NuL could be attractive and prosperous again. NuL needs to look carefully at its architectural, cultural and historical heritage. Like SoT, it needs to distinguish between legacy and heritage. Eyesores such as the Zanzibar need to be demolished.

A number one priority for NuL should be to put its heritage to work in the town centre. NuL needs to create heritage 'corridors' linking the town centre to heritage, cultural, conservation and residential areas that lie outside the ring road; to complement its heritage areas with attractive outdoor spaces; and to mitigate the blighting impact of the ring road on both the town centre and the areas immediately beyond it.

As in the case of SoT, population could be attracted to town-centre living if the historic, cultural, leisure and shopping facilities were right.

Like the Six Towns, NuL needs first-rate public transport links to the main cultural and economic centre in Hanley and to the railway station.

## **Rural heritage – land and the natural environment**

The Heritage technical paper makes no recognition of the heritage value of the land and natural environment. Reflecting the overall focus of the technical paper, its only focus on the rural area is on the built environment (traditional farmsteads).

NuL's rural area makes up 80% of the borough's area and cannot be overlooked in the consideration of heritage. Further, a more rounded and holistic picture of the rural area and its heritage is necessary.

### **Remnant of a lost rural environment and landscape**

Prior to their growth and development the urban areas of NuL and SoT comprised a rich rural environment and landscape of similar magnificence to that of the surviving rural area, in particular the Rural South. The borough's rural area is thus a remnant of a much larger area of undeveloped countryside that once existed.

The landscape and environment of the rural area need to be recognised as heritage assets of at least equal importance to those of the urban area.

Staffordshire's County Development Plan of 1958 identified 'Six areas of special landscape value', of which one included a large area in what is now NuL's Rural South: '(c) Maer and Hanchurch Hills (area about 22 sq. miles). The area extends from the Maer Hills at the north-west to Trentham Park at the north-east and includes Whitmore and Swynnerton Old Park. Towards the south-west the

boundary extends to near Ashley and at the south it includes the villages of Maer and Swynnerton. Tittensor and Bury Bank are included at the south-east.'

The rural area also has its own history, of both local and wider, regional and national importance, one example being the battlefield of Blore Heath and the village of Mucklestone.

### **Economic and health and well-being values**

The rural area as a landscape, natural and historical heritage asset belongs to the whole borough and its residents, not just to the rural population and its landowners – at whose expense it is maintained.

While the rural area has an obvious and vital economic role through the extractive industries of agriculture, forestry and mineral extraction and opportunities for rural-based business, the rural area as heritage asset has a major economic contribution to make in terms of:

- both local and inward tourism
- holidaying
- land-based rural sports such as fishing, shooting and horse riding.

It makes a further contribution in terms of the promotion of health and well-being through leisure activities such as walking, cycling and the study and appreciation of the natural environment and its biodiversity; and through educational opportunities. All of these activities too can render an economic return.

### **Transport**

Lack of adequate public transport in the rural area is a major problem to be addressed, particularly the lack of services on weekends and holidays. One-fifth of NuL households have no access to a car, which means that they also have no or very limited access to the borough's rural heritage.

### **Comments on specific points in Issues Consultation paper**

para.7.11 Designated conservation areas need to be accessible to the public and to be put to work to 'add value', otherwise their designation is redundant.

p.66 'Heritage is often seen as a barrier to development'. Heritage is a barrier to development when it is not properly identified and understood.

para.7.19 '...it is essential to only encourage those new uses [of traditional farmsteads] which are sensitive to the historic character and significance of the buildings'. The Plan needs to avoid making policies that stand in the way of sustainable business development in the rural area. Farmsteads offer large and adaptable spaces that can be put to a wide range of new business and industrial uses and still be compatible with the rural setting. What happens on

the inside of the building is not material to its external appearance; also, well-designed modern additions to such buildings could make an important contribution.

para.7.20 The redevelopment of redundant and cleared pottery industry sites, for both residential and business uses, should be a major objective of the Plan.

para.7.21 If there is no use for redundant industrial and public buildings, their value needs to be questioned and reassessed.

para.7.22 Everything does not have to be preserved. Not everything that is old is a heritage asset. Some structures have a negative legacy value.

p.67 'Understanding the size and scale of heritage assets as they are often large in scale due to the industrial history of the area.' Don't give protections that stand in the way of progress. Do not confuse legacy and heritage.

para.7.24 Don't try to protect buildings that have a short life and no longer have value. In terms of the bottle oven, the Gladstone Museum performs a key role, as do City Museum, library and archive collections. Also, there is a recognised place in the heritage industry for reconstructions.

p.68 'Safeguarding buildings that do not have statutory protection.' Consider whether they have any value that makes them worth safeguarding at all, and whether NPPF para. 139 has been misunderstood and misapplied.

### **Additional comments**

- Paragraph 157 of the NPPF states that the Local Plan should "identify land where development would be inappropriate, for instance because of its environmental or historic significance" and "contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified". There is no mention of this in the Issues consultation paper.
- The NPPF also requires "local planning authorities to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in future. Local planning authorities should therefore either maintain or have access to a historic environment record. It also identifies 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". There is no mention of this in the Issues consultation paper
- Strategic Aim 16 (SA16) of the Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy 2009 to 2026 sets out "to eliminate poor quality development and establish a culture of

excellence in built design by developing design skills and understanding, by requiring good, safe design as a universal baseline and distinctive design excellence in all development proposals, and by promoting procurement methods which facilitate the delivery of good design". This is also recognised as a weakness in the supporting Heritage technical paper but there is no mention of this in the Issues consultation paper.

- Piecemeal development is also registered as a weakness in the supporting Heritage technical paper but no mention of this in the Issues consultation paper.
- It is recognised in the supporting Heritage technical paper that neither council has a detailed historic environment characterisation study but there is no mention of this being addressed, or an issue in the Issues consultation paper.
- There is no mention of railway heritage and the opportunity to reopen local lines as a means of stimulating tourism and supporting the local transport infrastructure, which itself is recognised as a weakness elsewhere in the Issues consultation paper.

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