



Historic England

FAO: Planning Policy team
Test Valley Borough Council

Our ref: [REDACTED]

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by email only

02 April 2024

Dear Planning Policy team

Draft Test Valley Local Plan 2040: Regulation 18 Stage 2 *and* a Call for Sites

Thank you for consulting Historic England on the draft Test Valley Local Plan 2040. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

In this letter I set out a summary of our general comments below and append more detailed comments and suggestions.

Paragraph 31 of the NPPF requires the preparation and review of all policies to be underpinned by relevant and up-to-date evidence. Focusing on the Borough's historic environment, we look forward to reading the Council's heritage topic paper and would welcome the opportunity to comment on a draft before it is finalised. Given this needs to inform the Local Plan, we assume the intention is to complete the topic paper relatively soon, thereby informing the next iteration of the Local Plan.

We note the intention is for the topic paper to include consideration of proposed allocations "that would affect heritage assets". We interpret this to mean proportionate¹ heritage impact assessment (HIA) to inform wording where more detail is needed. We consider HIA is particularly needed for the following sites, informed by liaison with the Council's conservation team and its archaeological advisers.

¹ By proportionate I mean the level of detail will vary depending on the site, its size and the number and significance of heritage assets affected.



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



- Northern area policy 5 (NA5): land at Manor Farm, North Andover
- Northern area policy 6 (NA6): land at Bere Hill, South Andover
- Northern area policy 9 (NA9): south of Thruxton aerodrome
- Northern area policy 10 (NA10): Thruxton aerodrome, Thruxton
- Southern area policy 5 (SA5): land south of the bypass, Romsey
- Southern area policy 6 (SA6): land at Velmore Farm

In terms of methodology, Historic England Advice Note 3 on '[The Historic Environment and Site Allocations in Local Plans](#)' recommends a 5-step approach:

- Step 1: identify which heritage assets are affected by the potential site allocation
- Step 2: understand what contribution the site (in its current form) makes to the significance of the heritage asset(s)
- Step 3: identify what impact the allocation might have on that significance
- Step 4: consider maximising enhancements and avoiding harm
- Step 5: determine whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness

Call for sites for economic development, and Gypsies, Travellers and Travelling Showpeople

Historic England has no sites to put forward for consideration. As you might expect, in line with our comments above, we highlight the need for proportionate heritage assessment when considering sites submitted for consideration as part of the Local Plan process, including potential impacts on heritage assets and their settings. The Council should also consider the impact of sites on heritage assets in adjoining local authority areas as appropriate.

Supporting such assessment, Historic England has produced a number of advice notes on the planning system. In addition to [The Historic Environment and Site Allocations in Local Plans](#) mentioned above, permit me also to flag our Good Practice Advice on [The Historic Environment in Local Plans](#).

I would welcome further engagement on any new sites the Council wishes to put forward, prior to reaching Regulation 19.

Detailed Comments

Our additional detailed comments on the draft plan are set out in an appendix. Where we have stated 'object', this is principally intended as a marker to convey that we are looking for more than is presented in the draft plan to deliver a sound approach.

To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed Local Plan, where we consider these would have an adverse effect on the historic environment.

I hope that these comments are helpful. If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely

Guy Robinson, BSc, MRTPI
Historic Environment Planning Adviser
Development Advice – London and the South East Region

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APPENDIX A: Detailed comments on the Regulation 18 plan

Page	Paragraph	Support / object	Comment	Suggested wording if appropriate
18	Vision	Support		
19	Objective – climate change	Comment	I wonder if the word “new” might be deleted? As later content in the draft plan makes clear, the local plan can support increased energy efficiency of existing buildings as well as in new development. Not all related measures will require planning permission (though some will); and the plan can set out its broad support for energy efficiency, including ways in which communities can respond effectively.	“Tackling climate change through transition to a carbon neutral future, where new development and local environments are adaptable and resilient to the changing climate. To increase energy efficiency from new development, facilitate more sustainable living, and manage the risks of flooding, whilst seeking to protect our water resources.”
20	Objective – our communities	Support		
21	Objective – town centres	Support		
22	Objective – built, historic and natural environment	Comment	<p>We support the objective.</p> <p>Focused on the supporting text, while statistics on the Borough’s designated heritage assets are welcome, I advise adding a short paragraph about what is not designated nationally and the contribution of locally important assets to the character of Test Valley.</p> <p>Also, this could pick up on scope for place-shaping enhanced by local context, not automatically seeing heritage as a constraint, but also as an opportunity, bringing historic buildings into new use, tackling heritage at risk and drawing from or better revealing existing character in support of distinctive places.</p>	
24	Objective - design	Comment	<p>We support the objective.</p> <p>Focused on the supporting text, we emphasise the contribution of heritage to character and the context of development. This should be made explicit in the text.</p>	“Test Valley benefits from a rich variety of landscapes, towns, villages and buildings. Development will need to respect and enhance our built, <u>historic</u> and natural environment for future generations to enjoy, whilst contributing to the delivery of healthy, inclusive, resilient and attractive places.”

32	Test Valley sustainable spatial strategy	Object	<p>While we do not fundamentally object to the Council's spatial strategy, its articulation here feels incomplete. We recommend clearer integration of the historic environment within the wording presented.</p> <p>To that end, I suggest a couple of changes for consideration.</p>	<p>"Promoting access to the countryside and conserving and enhancing the Borough's diverse <u>and historic</u> landscape character"</p> <p>"Promoting the town centres as destinations through delivering well designed, accessible, mixed-use developments with improvements to our public realm, <u>conserving and where possible enhancing locally important assets</u>, maximising the use of previously developed land, to support the day and evening economies in accordance with our Masterplans"</p>
38	Table	Comment	I am curious about the lack of reference to reuse of buildings for Tier 1 and Tier 2 settlements. Presumably reuse can feature in those tiers too?	
40	Spatial strategy policy 2 (SS2)	Comment	<p>I am not sure that "appropriate to the other policies" is entirely clear.</p> <p>I suggest revised phrasing for consideration.</p>	"...the principle of development and redevelopment will be permitted provided that it <u>accords with</u> appropriate to the other policies of the Local Plan and Neighbourhood Development Plans."
66	Policy 1 (NA1): Andover town centre	Comment	<p>Where will the 367 homes be located? Presumably stakeholders and indeed the Council will refer to the masterplan.</p> <p>Given 367 is not an insignificant number of dwellings, greater clarity is merited in this policy on where such development is expected, helping to ensure that heritage impacts and opportunities have been adequately and appropriately considered.</p> <p>Noting policy SA1 connects directly with the relevant masterplan, stating "South of Romsey Town Centre Masterplan Area will accommodate appropriately [sic] 30 homes", could a similar approach be taken here?</p> <p>Ideally the policy would specify key housing sites within the town centre, and perhaps through the evidence underpinning the masterplan, help to demonstrate that the plan is not over- or under-allocating capacity.</p>	"Andover Town Centre <u>Masterplan area</u> will accommodate approximately 367 homes"
66	4.29	Comment	The text states that a draft design guide will be prepared. Presumably one could say that a design guide will be prepared, informed by public consultation i.e. the intention is not to stop at the draft stage?	

66	4.32	Comment	We recommend adding reference to the numerous listed buildings within Andover and its locally important buildings (non-designated heritage assets).	"The historic core of Andover is covered by a conservation area <u>and includes numerous listed and locally important buildings....</u> "
68	Northern area policy 2 (NA2): delivering high quality development in Andover town centre	Comment	<p>We broadly support this policy, and suggest minor amendment to criterion a.</p> <p>In addition to making clear that considerations include the significance of listed buildings (rather than views to/from those buildings), the criterion should focus on what is required, rather than what the CAAMP contains.</p> <p>Arguably it would be better to refer to archaeological remains within a grouping associated with other heritage assets as suggested.</p>	"Contextual analysis <u>is required, will take into taking full account of</u> Andover Conservation Area Appraisal and Management Plan, <u>to understand, conserve and where possible enhance. This document identifies</u> key views to, from and including important buildings and landmarks, <u>the significance of listed and locally important buildings, and the town's archaeological resources, and respond positively to</u> architectural styles <u>and</u> , building materials, distinctive features, <u>and details and archaeology.</u> "
73	Northern area policy 4 (NA4): land south of London Road, Picket Twenty	No comment		
76	Northern area policy 5 (NA5): land at Manor Farm, North Andover	Object	<p>While we do not object to development of this site in principle, in my letter of 31 October 2023, I recommended proportionate heritage impact assessment (HIA) to inform the allocation. Given the highly graded nature of the church, we re-assert our recommendation for HIA at this stage to inform the allocation, to verify that the site is not under- or over-allocating housing and confirm how important rurality is to the church.</p> <p>Also, there is a word missing from criterion b.</p>	"Submission of a Heritage Impact Assessment, <u>which demonstrates</u> how the layout and design of the development will respond sensitively to the significance of nearby heritage assets in Knights Enham,"
78	Northern area policy 6 (NA6): land at Bere Hill, South Andover	Object	<p>As above, I recommend proportionate HIA to inform the allocation.</p> <p>Noting the site includes / has the potential to include assets of archaeological interest, we advise referring in policy to archaeological remains, and add a reference to the HER in the supporting text. Also, we advise liaising with the Council's archaeological adviser to ensure they support the approach taken.</p>	"Submission of a Heritage Impact Assessment (<u>incorporating archaeological assessment</u>) to demonstrate how the layout and design of the development will respond sensitively to the significance of Ladies Walk, the Iron Bridge <u>and, the listed buildings adjacent to the site and the site's archaeological remains,</u> "

81	Northern area policy 7: land to the east of Ludgershall	No comment		
83	Northern area policy 8 (NA8): land to the south east of Ludgershall	No comment		
86	Northern area policy 9 (NA9): south of Thruxton aerodrome	Object	<p>As above, we advise proportionate HIA to inform the allocation.</p> <p>In exchanges in early 2023, we welcomed the Test Valley officer comments that “due to the size and scale of the buildings, the views from the conservation area and listed buildings will need to be considered as well as views from Scheduled Ancient Monument; and the effect of lighting should also be considered.”</p> <p>There is no indication that these issues have been considered further at this stage, nor that the applicant will be required to consider much matters. We suggest adding a new criterion to the policy as shown opposite, accompanied by appropriate supporting text.</p>	<p><u>“e) The layout and form of development will avoid or minimise harm to the setting of Thruxton Conservation Area, its listed buildings and Scheduled Monument;”</u></p>
88	Northern area policy 10 (NA10): Thruxton aerodrome	Object	<p>As above, we recommend proportionate HIA at this stage to inform the allocation.</p> <p>One could interpret the proposed policy to mean that less than substantial harm is acceptable in this location. Nuanced wording is needed, informed by proportionate evidence.</p> <p>In a similar vein to the heritage buffer applied near to the designated heritage assets of Knights Enham for the Manor Farm, we anticipate that a heritage buffer nearest the Scheduled Monument is likely to be appropriate.</p> <p>For information on Thruxton airfield, the significance of which should also be taken into account, refer to https://historicengland.org.uk/research/results/reports/75-2016</p> <p>The extent to which the airfield is of heritage interest does not seem to be acknowledged in the approach to this site’s development.</p>	<p>“The layout and form of development will avoid significant adverse impacts on the areas of higher landscape sensitivity to the north of the site and <u>avoid or minimise harm to the setting of the Thruxton Conservation Area, its listed buildings and Scheduled Ancient Monument; where opportunities exist to enhance the setting of designated heritage assets, they should taken.</u>”</p>

			To align with terminology in the NPPF, we recommend reference to Scheduled Monument, rather than Scheduled Ancient Monument.	
92	Southern area policy 1 (SA1): Romsey Town Centre	Comment	Presumably "appropriately" should be "approximately"?	"South of Romsey Town Centre Masterplan Area will accommodate <u>appropriately approximately</u> 30 homes."
93	Delivering high quality design in Romsey town centre	Comment	I recommend adding a short paragraph at the end of this section on nearby Registered Parks and Gardens, in particular the contribution made by Broadlands Registered Park and Garden (Grade II*) to the town.	
94	Southern area policy 2 (SA2): delivering high quality development in Romsey town centre	Comment	<p>We broadly support this policy, and suggest minor amendment to criterion a.</p> <p>The current wording could be interpreted to include views to, from and including listed buildings, without fully considering the significance of those buildings.</p> <p>Arguably it would be better to refer to archaeological remains within a grouping associated with other heritage assets as suggested.</p>	<p>"Contextual analysis will take full account of the Romsey Conservation Area Appraisal and Management Plan (CAAMP), <u>to understand, conserve and where possible enhance including with regard to any key views to, from and including, important buildings and landmarks, the significance of and listed and locally important buildings, and the town's archaeological resources</u>, and will have regard to architectural styles and built form, historic street patterns, building materials, <u>and details and archaeology</u>."</p>
100	Southern area policy 4 (SA4): land south of Ganger Farm, Romsey	No comment		
103	Southern area policy 5 (SA5): land south of the bypass, Romsey	Object	<p>As above, while we do not object to development of this site in principle, the plan's evidence base needs to ensure that potential heritage impacts have been appropriately considered.</p> <p>In our exchanges in 2023, we recommended proportionate HIA to inform the allocation. We re-assert our recommendation for proportionate HIA at this stage.</p>	

106	Southern area policy 6 (SA6): land at Velmore Farm	Object	<p>In our letter of 31 October 2023, we stated: "It is good to see reference to a green corridor linked with the Roman road. That said, I am keen to understand what archaeological work has been done to inform the allocation. My impression is that more work is merited, including field evaluation, which would help the Council to proceed with greater confidence. If archaeological evaluation, topographic and/or geophysical survey demonstrate good archaeological survival of the road below ground, it is likely to be a good candidate for scheduling, particularly as it would have group value with the stretch of Roman road to the north. The sooner there is more clarity the better. The outcomes of such work are likely to impact on the final policy wording and the Council's ambitions for this site."</p> <p>Has any further work been done to bring more clarity to what is there?</p> <p>If not, informed by further liaison with the Council's archaeological adviser, might a simple archaeological assessment be done at this stage (a desk-based assessment and field survey) to ensure existing evidence for this allocation is clear? The outcomes of such work could be incorporated into the Council's heritage topic paper.</p> <p>Paragraph 4.198 states that "The likelihood of surviving earthworks has been identified"; what is that likelihood? Low or high?</p> <p>As a final comment, we encourage the policy approach to introduce a positive place-shaping element to the presence of the Roman road, going beyond conserving the asset to eliciting a positive design response. This could be done with reference to the masterplan, as shown in the proposed wording, supported by appropriate supporting explanatory text.</p>	<p>"f) Submission of an archaeological assessment to inform conservation of archaeological remains of the former Roman road <u>and a sensitive design (demonstrated through its masterplan) that responds positively to the heritage assets identified</u>"</p>
108	Southern area policy 7 (SA7): land at King Ward Park, Ampfield	No comment		

111	Southern area policy 8 (SA8): land at Upton Lane	No comment		
112	Southern area policy 9 (SA9): land adjacent to Abbey Park industrial estate, Romsey	No comment		
114	Southern area policy 10 (SA10): land south of Botley Road, Romsey	Comment	I suggest mentioning in the supporting text the listed buildings west of the roundabout, noting that Luzborough House is Grade II*.	
116	Southern area policy 11 (SA11): land east of Test Valley business park	No comment		
117	Southern area policy 12 (SA12): Kennels Farm, University of Southampton Science Park, Chilworth	No comment		
119	Southern area policy 13 (SA13): University of Southampton Science Park, Chilworth	Comment	Reference is made to Chilworth Old Village. Reference should also be made to the Conservation Area. As the Council is aware, it has a duty to preserve or enhance the character or appearance of that area.	"b) It is not visually intrusive in views from the M27 motorway, the A27, Chilworth Old Village, or Chilworth and does not detract from the setting of Chilworth Manor and garden and <u>Childworth Old Village conservation area</u> ."

120	Southern area policy 14 (SA14): land at Adanac Park, Nursling	Comment	Reference should be made need to be made to Yew Tree Farmhouse (Grade II), to avoid or minimise harm to its setting.	
121	Southern area policy 15 (SA15): Nursling estate, Nursling	No comment		
122	Southern area policy 16 (SA16): Forest Park	No comment		
123	Southern area policy 17 (SA17): Stockbridge local centre	No comment		
129	5.19	Comment	A fabric first approach is appropriate for new development, but it would not be suitable for traditionally constructed buildings, which require a whole building approach (as stated in paragraph 5.56). It would be good to make this clear in paragraph 5.19.	"In reducing demand for energy <u>for new development</u> (including in relation to heating and cooling), a 'fabric first' approach should be taken..."
131	Policy C1: Countering climate change	Support		
136	Footnote 53	Comment	<p>I suggest revising the weblink to connect with our new Advice Note on the climate change adaptation of historic buildings, published for consultation in late 2023.</p> <p>Noting the final version of this Historic England Advice Note is not yet published, I suggest referring to the following webpage, from which the note will be accessible (alongside other relevant advice):</p> <p>https://historicengland.org.uk/advice/climate-change/</p>	

137	Policy CL3: Sustainable buildings and energy use	Comment	I encourage strengthening the support for the retention and reuse of buildings.	"All development should take opportunities to reduce the development's embodied carbon content, through <u>favouring the retention and reuse of buildings where possible and</u> the careful choice, use and sourcing of materials."
138	5.59	Comment	In the opening paragraph I suggest adding a line or two on the links between the water environment and the historic environment. I suggest wording for consideration.	"The water environment in the Borough is important for its ecological value, its influence on the character and identity of the area, as a source of drinking water, and its influence on the local economy including farming and tourism. <u>The historic environment connects to the water environment in various ways, from influencing the heritage significance of a place and how land use has evolved over time, to impacts on heritage assets when flood events occur. The preservation of archaeological remains can be dependent on water levels.</u> "
141	5.75	Comment	I recommend adding a line to make totally clear that site specific assessment will still be required.	"In balancing planning matters, considerable weight will be given to the benefits of supporting the delivery of additional renewable and low carbon energy. This however does not automatically override environmental protections for example. <u>Site specific assessment will still be required.</u> Additionally, as set out in the policy, significant weight would be given to community led schemes."
142	Policy CL5: renewable and low carbon energy	Comment	<p>We welcome the plan's support for renewable energy development and the inclusion of criterion c in policy CL5. That said, one could argue that "giving consideration" to significance could simply involve considering the matter, and lead to a scheme that harms an important asset without a policy mechanism being triggered that would support effective decision-making.</p> <p>I believe a stronger steer would be better, in both policy and supporting text. In policy, I suggest adding a reference to <u>proportionate</u> heritage impact assessment and I propose wording for consideration.</p>	<p>In the policy:</p> <p>"c) The significance of designated and undesignated heritage assets (including their setting), <u>considered through proportionate heritage impact assessment in accordance with policy ENV2;</u>"</p>

			<p>In the supporting text, I recommend outlining what is required in proportionate heritage impact assessment, including making clear that the setting of heritage assets has not been considered in the Council's evidence base (identifying potentially suitable areas for wind and solar development) and adding a footnote to our advice note on the setting of heritage assets:</p> <p>https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</p> <p>Taking an example at random, land south of Bury Hill camp Scheduled Monument, east of Abbots Ann, has been identified as potentially suitable for large-scale wind development (with a tip height of 60-100m). We infer the research has not considered potential harm to nearby designated heritage assets of such development.</p>	
153	5.121	Comment	<p>I'd recommend being consistent in avoiding the implication that "built" is synonymous with "historic".</p>	<p>"...Test Valley's built, historic and natural environment is rich and varied, with parts of the Borough being of international wildlife importance, national landscape importance and important heritage value."</p>
154	5.129	Comment	<p>I suggest referring to Test Valley when introducing the different types of heritage asset that are listed.</p> <p>Also, I suggest correcting a minor technicality: referring to archaeological remains rather than archaeology (the study of those remains).</p>	<p>"The historic environment of Test Valley incorporates a wide range of heritage assets, including buildings, features or groups of buildings (which may also be listed buildings⁶¹), parks and gardens, conservation areas, historic landscapes and features, above and below ground archaeological remains, scheduled monuments and registered parks and gardens..."</p>
154	Footnote 61	Comment	<p>Currently the wording risks implying that Historic England designates buildings as listed buildings. I suggest tweaks that would avoid being caught up in the process of designation.</p> <p>Also, I advise adding a reference to the Council's duty under the 1990 Act.</p>	<p>"Listed Buildings are <u>designated identified through Historic England</u> for their special architectural and historic interest. They are designated heritage assets which have additional protection under the planning system. <u>As local planning authority, the Council has a legal duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 to have "special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses".</u></p>

154	5.131	Comment	<p>I believe the “5” after Grade II should be 65, which would also impact on the subsequent footnote numbering.</p> <p>I suggest adding “designated” when referring to the 10 assets on the Heritage at Risk Register. Does the Council maintain a local register for historic buildings at risk? If so, it would be good to include that information here too, helping to unpack what is covered under criterion c of the policy.</p> <p>I suggest adding a line about non-designated heritage assets of archaeological interest that may be of equivalent significance to scheduled monuments, which are also mentioned later in this section of the plan.</p>	<p>“...There are 38 conservation areas⁶² within Test Valley, 2243 listed buildings (23 Grade I listed buildings⁶³, a further 98 Grade II*⁶⁴, and 2122 at Grade II⁶⁵ and 8 registered historic parks and gardens⁶⁵ (3 Grade II* and 5 Grade II). There are 96 Scheduled Monuments⁶⁶ scattered throughout the Borough and ten <u>designated</u> heritage assets that are considered at risk⁶⁷. In addition to these designated heritage assets, the Borough also has a varied mix of non designated heritage assets, which have a degree of significance for planning decision making under the provisions of the NPPF. <u>Some non-designated heritage assets of archaeological interest may be demonstrably of equivalent significance to scheduled monuments.</u>”</p>
154	Footnote 62	Comment	<p>I recommend adding a reference to the Council’s duty under the 1990 Act.</p>	<p>“Conservation Areas are designated heritage assets. They are defined areas that have special architectural and historic interest and where extra planning controls and considerations are in place to protect the historic and architectural elements which make them special. <u>As local planning authority, the Council has a legal duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to desirability of preserving or enhancing the character or appearance of that area.</u>”</p>
155	Policy ENV1: Historic environment	Comment	<p>We welcome this strategic policy.</p> <p>In criterion d, I recommend adding reference to management plans, noting section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to draw up and publish proposals for the preservation and enhancement of conservation areas in their districts from time to time i.e. this is going beyond appraising character.</p> <p>I recommend expanding the supporting text for this policy:</p> <ul style="list-style-type: none"> explaining the different approaches to heritage at risk, including both assets nationally and locally identified. 	<p>d) preparing, adopting and where needed updating Conservation Area Appraisals <u>and Management Plans</u>; and</p>

			<ul style="list-style-type: none"> • unpacking the activities referenced in criterion c, such as identifying buildings of local importance and the Council's approach to non-designated archaeological remains. • outlining the current position on Conservation Area Appraisals and Management Plans (CAAMPs), perhaps reiterating the importance of the CAAMPs to development in Andover and Romsey in particular. 	
156	5.138	Comment	I suggest referring to specific legislation or deleting the line on the Council's statutory duty regarding setting i.e. "In considering such proposals, the Council has a statutory duty to consider the impact of development on the setting of the heritage asset."	
156	Footnote 69	Comment	As suggested regarding footnote 53, I suggest revising the weblink in footnote 69 to connect with our new advice note on the climate change adaptation of historic buildings, published for consultation in late 2023. Its final version is not yet available, so I suggest referring to the following landing page, from which the note will be accessible (alongside other relevant advice): https://historicengland.org.uk/advice/climate-change/	
159	Scheduled Monuments	Comment	Within this section on Scheduled Monument, I suggest adding lines to encourage early engagement with Historic England if a proposal is likely to constitutes works as defined by the Ancient Monuments and Archaeological Areas Act 1979. Most work in Scheduled Monuments will require a prior application for Scheduled Monument Consent. Historic England can advise on the need for such consent.	
159	Footnote 71	Comment	Please check the footnote	
159 - 160	Assessing harm to heritage assets	Comment	The placing of this subsection feels illogical in the middle of subsections of text on different types of heritage asset. Might it be moved to the opening or end of this section?	

160	5.163	Comment	Could the sentence "The landscape of the Borough is also considered a historic asset" be tightened? Presumably the entirety of the landscape should not be treated as a non-designated heritage asset.	"The landscape of the Borough is also considered a historic asset. It has evolved through past processes and activities, including ..."
161	5.165	Comment	A technicality, I suggest referring to remains rather than the study of those remains.	"The policy makes provision for the protection and conservation of <u>archaeological remains.</u> "
161	5.168	Comment	I recommend adding a reference to the setting of the asset(s)	"Proposals will need to demonstrate that any development has been sensitively located and designed (<u>including with respect to the setting of the asset(s)</u>), and that appropriate provision has been made for ensuring the preservation in situ and on-going management, conservation and protection of above or below ground heritage"
161	5.172	Comment	Note, again a technicality, archaeological remains are an integral part of heritage. I query the line "Such sites may become designated heritage assets". This could imply that responding positively to existing heritage assets increases the chances of those assets being designated, which I am not sure is what is meant. Rephrase or delete?	"In some cases, heritage and such as archaeological remains may offer opportunities for history to be positively incorporated into the design and layout of a development and for the local community to engage with any findings. Such sites may become designated heritage assets... "
162 - 164	Policy ENV2: Development affecting heritage assets	Object	The policy would benefit from being strengthened in two respects. I recommend revising criterion 3 to add detail on the ways in which the proposal can sympathetically respond to the significance of a Listed Building. I am not sure how effective the phrase "well considered" design will be in terms of decision-making. There is also the opportunity to refer to a change in use of the Listed Building. I suggest wording for consideration. Also, the policy does not include a similar subsection on Scheduled Monuments, which feels like a significant omission. I advise adding a short paragraph on Scheduled Monuments that would complement the later lines on archaeological resources and encourage proposals to respond positively to the significance of SMs e.g. as could apply in development at Velmore Farm. I suggest wording for consideration.	"For listed buildings Proposals to extend or alter the fabric or layout of a listed building will sympathetically preserve, enhance or better reveal any features or spaces of special architectural or historic interest. Proposals will be of well considered design and will be sufficiently detailed to demonstrate the preservation or enhancement of the significance of the asset <u>with respect to design, construction and layout. Proposals that entail a change of use will need to demonstrate that the original use of the Listed Building is no longer viable or sustainable and that the proposed alterations are necessary to secure the long-term survival of the Listed Building.</u> "

				<u>"For Scheduled Monuments Development that may affect the significance of a Scheduled Monument (including its setting) should demonstrate the steps that would be taken to avoid and minimise harm, and respond positively to the asset's significance."</u>
166	Policy ENV3: landscape character	Support		
171	Policy ENV5: Pollution	Object	The policy seeks to avoid unacceptable impact from pollution. However, it does not mention the historic environment. While most pollution cases may relate to the stated concerns, a proportion will also need to consider the impact of development on the historic environment. Taking a hypothetical example, the impact of pollution from development at Thruxton aerodrome on the appreciation and potentially significance of designated heritage assets at Thruxton.	"Development will only be permitted where it does not result in an unacceptable impact from pollution on human health, living conditions, the natural <u>and historic</u> environment or general amenity, including through cumulative effects."
181 - 185	Biodiversity net gain, Green Infrastructure, and Trees and Hedgerows	Comment	<p>Effective decision-making benefits from considering the natural and historic environment in an integrated way e.g. taking into account archaeological considerations in sites better known or indeed designated for their natural beauty. We recommend adding relevant text on the way in which the natural and historic environments are inter-connected.</p> <p>Newly created or altered habitats will sit within a historical landscape and may have both positive and negative impacts on setting as well as physical and chemical conditions of heritage assets. Consequently, heritage needs to be considered in the context of both BNG and tree planting (policies BIO3 and BIO5, respectively).</p> <p>Relevant publications include Heritage Counts from Historic England and from Natural England: https://worldheritageuk.org/articles/latest-news/nature-recovery-the-historic-environment/ and Green Infrastructure Framework.</p> <p>Natural England's GI Framework principles document and the subsection on heritage features and the historic environment in the Framework's Planning and Design</p>	

			Guide may be particularly useful (supporting policy BIO4).	
193	5.313	Comment	The paragraph currently includes text that simply states "Link to other policies"	
194	DES1: Delivery of sustainable and high quality design	Comment	While we support the policy, it would be improved to mention explicitly setting as a consideration in criterion B. We suggest wording for consideration.	"Development will maintain or enhance the sense of place and distinctive character of the locality, through taking account of the individuality of the Borough's settlements, landscapes, buildings, ecology, topography, history and heritage assets (<u>including their setting</u>),"
195	5.324	Comment	We recommend adding a consideration to this paragraph that refers also to the setting of heritage assets.	"Larger scale buildings may be appropriate provided that important views, especially of landmark features from public places (including transport corridors, public realm and rights of way) are retained <u>and consideration is given to potential impacts on the setting of heritage assets.</u> "
197	DES2: Design details and considerations	Support	We welcome this policy.	
198	DES3: Residential Areas of Special character	Support	We welcome this policy	
222	Replacement dwellings in the countryside	Comment	I suggest adding cross-references to other relevant local plan policies in the supporting text... <ul style="list-style-type: none"> to policies CLI1 and CLI3, noting the role of embodied carbon in the decision-making process, and encouragement for re-use where practicable in accordance with policy EC2; and to heritage significance, seeking to avoid the loss of features of heritage interest and the presumption in favour of retaining non-designated heritage assets in policy ENV2. 	
226	Policy EC2: Re-use of buildings in the countryside	Support	We welcome this policy	