

Neighbourhood Planning
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover, SP10 3AJ.

Our ref: HD/P5240/
Your ref:
Telephone 01483 252040
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25th October 2018

Dear Sir or Madam,

Goodworth Clatford Neighbourhood Plan Regulation 15 Submission Draft

Thank you for the e-mail advising Historic England of the consultation on the Goodworth Clatford Neighbourhood Plan. We are pleased to make the following comments.

We would welcome a little more about the historical development of the parish in section 3, although we welcome paragraph 1.23. We note the reference to other buildings of local interest being identified in the Conservation Area Character Appraisal, but is there an actual list of locally-important buildings and features throughout the parish ?

Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity. If not, then this could usefully be a community action project to expand the evidence base for the Plan (advice on local listing is available on our website - <http://www.historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/> - and we would be pleased to provide further assistance).

National Planning Practice Guidance states “... *where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions*”.

We welcome the identification of “*Conserving and enhancing theheritage assets of the Neighbourhood Area, for future generations to enjoy*” and “*Conserving and enhancing the character and appearance of the Goodworth Clatford Conservation Area*” as issues to be addressed, although we suggest the addition of “*special interest*” as regards conservation areas, as this is the basis for their designation.

Has there been any or is there any ongoing other loss of character in the Conservation Area (or elsewhere), e.g. through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc that affect local character ?

Although none of the heritage assets in the parish are currently on the Historic England Heritage at Risk Register the Register does not include Grade II listed secular buildings outside London. Has a survey of the condition of Grade II buildings in the Plan area been undertaken ? If not, this could be another community action project to add to the evidence base for the Plan.

We welcome and support “*characterised by conserved and enhanced heritage assets including listed buildings and the Conservation Area*” as part of the Vision Statement for the parish. However, we would like to see specific objectives for the historic environment, as there are for the natural environment, e.g, “*To conserve and enhance the significance of heritage assets in the Parish*”, “*To conserve the special interest, character and appearance of the Goodworth Clatford Conservation Area*” and/or “*To improve access to, understanding and appreciation of heritage assets in the Parish*”.

We welcome Policy SP1. We consider that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan. Characterisation studies can also help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.

We therefore welcome the landscape character area assessments, the Conservation Area Character Appraisal and the Village Design Statement and the reference to these in paragraphs 3.8 – 3.12.

We welcome, in principle, clause c. of Policy SP3, although care has to be taken as regards views and setting – the issue is the significance or special interest of the heritage asset itself, which may be affected by development within its setting. Where views of or from a listed building or scheduled monument are important to its significance, or views to or from the conservation area are important to its special interest, character or appearance, then it is appropriate to seek to protect those views to conserve that significance or special interest, but this is a separate matter to protecting views for their landscape, townscape or amenity value.

We therefore suggest that a slight rewording of clause c.; “*the significance or special interest of heritage assets are conserved or enhanced, including through the protection of views that contribute to that significance or special interest, in accordance with policy BE2*”.

We suggest that Policy NE2 be retitled “Natural features” (as in paragraphs 3.30 and 3.31), as the features identified can also make a significant contribution to the character and amenity of developed areas (indeed, paragraph 3.33 notes that the



“Goodworth Clatford Conservation Area Character Appraisal also points to the importance of features such as mature trees, hedges, open spaces and other natural elements.....”).

Policy NE5 could include “historic significance” alongside “*character, appearance or the use...*”.

We suggest that the section on the “Built Environment” be retitled “Built and Historic Environment”, or there be a separate section for the Historic Environment – not all the historic environment, or even heritage assets are “built” and the National Planning Policy Framework recognises the built environment and historic environment as separate entities (in paragraph 8 c), 20 d), 28 and the Glossary).

We welcome and support Policy BE1, which we consider is consistent with paragraph 125 of the National Planning Policy Framework; *“Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development”*.

We welcome and support, in principle, Policy BE2. However, we suggest that the opening paragraph be *“Development proposals should conserve and enhance the significance, special interest, character and appearance of designated and non-designated heritage assets throughout the Neighbourhood Area. These comprise listed buildings, buildings of local interest, archaeological sites and the historic landscape”*.

We also suggest that the policy be slightly rephrased to say *“Development proposals within or adjacent to the Goodworth Clatford Conservation Area or likely to affect the significance of other heritage assets will be permitted provided they:.....”* to be consistent with paragraph 16 of the National Planning Policy Framework that plans should *“contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”*. Clause 2 should include *“special interest”* as well as *“character and appearance”* as this is the basis on which conservation areas are designated.

We would like to see a new clause added to Policy BE2: *“conserve and enhance the significance of other designated and non-designated heritage assets”*. The public benefits arising from a development proposal are not really a matter to be considered in considering the impact of proposed development, but rather in determining whether or not planning permission should be granted after the degree of harm to the significance or special interest of the heritage asset(s) has been identified as a separate, preceding, exercise.



We therefore suggest that the last paragraph of Policy BE2 be rewritten as a new clause 6: *“provide public benefits that could not otherwise be provided that are considered to override any harm to the significance, special interest, character or appearance of designated or non-designated heritage assets in a manner appropriate to the significance of the assets affected as set out in national planning policy and TVBLP policy E9.”*

We welcome paragraphs 3.76 – 3.80 and the references to historic environment in clause 6 of Policy CB5 and paragraph 3.98.

We hope you find these comments helpful. Should you wish to discuss any points within this letter, or if there are particular issues with the historic environment in Goodworth Clatford please do not hesitate to contact us.

Thank you again for consulting Historic England.

Yours faithfully,

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Appendix: Sources of Information

The National Heritage List for England: a full list with descriptions of England's listed buildings: <http://list.historicengland.org.uk>

Heritage Gateway: includes local records of historic buildings and features www.heritagegateway.org.uk

Heritage Counts: facts and figures on the historic environment <http://hc.historicengland.org.uk>
<http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/> has information on neighbourhood planning and the historic environment .

HELM (Historic Environment Local Management) provides accessible information, training and guidance to decision makers whose actions affect the historic environment. www.helm.org.uk or www.helm.org.uk/communityplanning

Heritage at Risk programme provides a picture of the health of England's built heritage alongside advice on how best to save those sites most at risk of being lost forever. <http://risk.historicengland.org.uk/register.aspx>

Placecheck provides a method of taking the first steps in deciding how to improve an area. <http://www.placecheck.info/>

The Building in Context Toolkit grew out of the publication 'Building in Context' published by EH and CABE in 2001. The purpose of the publication is to stimulate a high standard of design when development takes place in historically sensitive contexts. The founding principle is that all successful design solutions depend on allowing time for a thorough site analysis and character appraisal of context. <http://building-in-context.org/toolkit.html>

Knowing Your Place deals with the incorporation of local heritage within plans that rural communities are producing, <http://www.historicengland.org.uk/publications/knowning-your-place/>

Planning for the Environment at the Neighbourhood Level produced jointly by English Heritage, Natural England, the Environment Agency and the Forestry Commission gives ideas on how to improve the local environment and sources of information. <http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf>

Good Practice Guide for Local Heritage Listing produced by Historic England, uses good practice to support the creation and management of local heritage lists. <http://www.historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/>

Understanding Place series describes current approaches to and applications of historic characterisation in planning together with a series of case studies <http://www.helm.org.uk/server/show/nav.19604>



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Oxford Character Assessment Toolkit can be used to record the features that give a settlement or part of a settlement its sense of place
<http://www.oxford.gov.uk/PageRender/decP/CharacterAppraisalToolkit.htm>



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