



The Clerk
Walberton Parish Council
Parish Council Office,
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BN18 0PJ

Our ref: 2015.09.29
Your ref: Walberton NP
Pre-
submission
version HE
RLS
Comments
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By email only

29th September 2015

To whom it may concern:

re: Walberton Neighbourhood Plan Pre-submission Version Consultation

Thank you for consulting Historic England on the Pre-submission version of the Walberton Neighbourhood Plan. Neighbourhood Planning is principally an opportunity for the community to determine their own agenda for planning, albeit within the parameters set by the test of the basic conditions. As such, Historic England's remit is confined to providing advice on the means of achieving the objectives for the historic environment that the community themselves have determined, as well as ensuring the plan meets the basic requirements with regard to designated heritage assets, acting as a champion for the historic environment and promoting good practice in planning for the historic environment. We have published guidance on considering the historic environment in Neighbourhood plans which you can view online at: <https://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

Turning to the detail of the plan I have a small number of observation and suggestions to make.

Identify and protect the 'positive features' of the conservation areas' settings

Policy VE 4 Whilst we support the desire to protect the valued features of the conservation areas' settings, the policy as written is too prohibitive to conform with the requirements of the NPPF and Localism Act to support sustainable development. In order for a revision to avoid merely repeating national or local policy it would be helpful to consider what elements of the conservation areas' settings it is trying to sustain (such as their rural character, openness, or views across countryside to the South Downs) and how these contribute to the special historic or architectural interest of the area. Are historic rural buildings seen in a rural context for example or

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is the visual connection of the village with its rural hinterland of importance to its character and our ability to understand it as an historic village?

An example of the wording for such a policy would be:

“New development must protect the open/rural character of the conservation area’s setting and sustain or enhance the visual connections between the village’s core and its rural hinterland, including longer views to the South Downs, which contribute to the character of the Conservation Area. Development proposals Will be expected to give particular care to the protection of the key view lines identified on the Neighbourhood Plan proposals map. ”

Identify and justify new Areas of Special Character to be considered for conservation area designation

We note that the current policy wording suggests the community would like to identify potential additions to the conservation areas in collaboration with the local planning authority. This is currently written as an aspiration rather than a policy to determine the use of land or inform decision making and is likely to be removed at examination, although it may be retained as supporting text to the policy or as part of a table of community aspirations. Nevertheless this suggests that the plan area may contain areas that might be affected by allocations and policies in the plan that are potentially worthy of conservation area status but that have not been considered as such at present, which could add uncertainty to decision making and raise concern over the sustainability of the plan.

Historic England support the use of neighbourhood plans as a means for the community to identify areas they feel merit consideration by the local authority for protection as conservation areas. As a first step the community could clearly identify areas they feel merit further consideration in planning due to their historic or architectural interest or because of their character or appearance as Areas of Special Character. Including policy in the plan that requires new development to protect the features that make a positive contribution to these areas’ character and clearly identifying why they merit protection in the plans evidence base would provide a level of protection to ensure they are a material consideration in planning decisions as soon as the plan is made. These would naturally form areas that would be prioritised for consideration for conservation area designation by the local planning authority although it would still be appropriate to identify this as a community priority in the supporting text to the policy or as part of a table of aspirations elsewhere within the plan. We would be happy to provide further advice on preparing suitable evidence, including using one of the community toolkits for undertaking character assessment that we have helped to develop.

Prepare a conservation area appraisal as part of the evidence base

We also note that the information presented in the District Council’s Conservation Areas Supplementary Planning Document for the Walberton conservation areas falls well below that set out in our published advice. By preparing an appraisal of the Conservation Area the community could add a robust planning document to the



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evidence base of the plan, including contributing to strengthening protection of its setting and capturing their own appreciation of the historic environment of the area. This might include consideration of the value of green spaces within the villages including the distinctive spaces of gardens, streets and lanes; identifying important views or landmark features; recognising the importance of areas with a particular use; or identifying particular unlisted buildings that contribute positively to each area's interest or character. It might also include a review of the conservation areas' boundaries and recommend any necessary extensions. Again, I would be happy to discuss how the community could undertake such work and the support that Historic England might be able to provide. In the meanwhile, our advice on the preparation of conservation area appraisals and management plans can be downloaded at: <https://historicengland.org.uk/images-books/publications/understanding-place-conservation-area/>. Without an appropriate appraisal it is difficult for the Council to demonstrate that in making the plan they have discharged their statutory duty to give special consideration to the desirability of preserving or enhancing the area's character or appearance. This need not be a lengthy document but should certainly improve on the present three paragraphs.

Justify the identification of new Buildings and Structures of Local Character against the adopted criteria and designate them within the plan

Policy VE 5. Historic England support the use of Neighbourhood Plans to identify features of the historic environment that should be recognised as non-designated or 'locally listed' heritage assets, such as buildings and structures of character. The wording of this policy may be too restrictive to conform with the National Planning Policy Framework, which, for example, points out that removing part of a heritage asset (such as a late addition) could help to better reveal its significance (by revealing hidden architectural features, for example).

In addition, the policy leaves some uncertainty about the status of the 'additional buildings' in Schedule 5, which depends on the District Council adding these to a future SPD, which will depend on their resources to produce. If the schedule provides sufficient analysis to explain why these buildings have been selected, ideally referring to the criteria adopted by the council for the existing list, there is no reason why the policy should not identify these as equivalent to the buildings already recorded and that they should be considered as Buildings of Character on the making of the plan by the District Council. Forwarding details of these buildings to the West Sussex Historic Environment Record (maintained by West Sussex County Council) would also provide a measure of public recognition of their significance. Our published advice on Locally Listing heritage assets can be downloaded at: <http://historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/>.

I hope these comments are of assistance in taking the neighbourhood plan forward but as I have indicated I would be interested in discussing further how Historic England can support you in developing the evidence base for the plan and making the policy wording more focused before the Submission version of the plan is prepared. I have also appended a list of sources of further information that may be of



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use to you. Please feel free to contact me if you would like to take this opportunity or if you have any further queries.

Yours faithfully

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Appendix: Useful sources for considering character and the historic environment in Neighbourhood Planning

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

Heritage Gateway: includes local records of historic buildings and features from the County Historic Environment Record: www.heritagegateway.org.uk

Heritage Counts: facts and figures on the historic environment: <http://hc.historicengland.org.uk>

Heritage and Neighbourhood Planning: Our general guidance page on incorporating heritage into your neighbourhood plan: <https://www.historicengland.org.uk/advice/hpg/historic-environment/neighbourhoodplanning/>

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. <https://www.historicengland.org.uk/advice/heritage-at-risk>

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

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

Planning for the Environment at the Neighbourhood Level produced jointly by Historic England, 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 English Heritage uses good practice to support the creation and management of local heritage lists. <http://www.historicengland.org.uk/advice/planning/local-heritage/local-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>

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>

West Sussex Historic Environment Record: The County's main record of the historic environment including details of archaeological finds as well as other historical features of the landscape including designated and non-designated heritage assets <https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/historic-environment-record/>

