



Historic England

Beverley Weddell
Plaistow and Ifold Neighbourhood Plan Steering
Group

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30th June 2017

Dear Ms Weddell,

Plaistow and Ifold Neighbourhood Plan SEA Scoping Report Consultation

Thank you for the e-mail of 5th June 2017 advising Historic England of the consultation on the Plaistow and Ifold Neighbourhood Plan SEA Scoping Report. We are pleased to make the following general and detailed comments.

The nature of the locally-led neighbourhood plan process is that the community itself should determine its own agenda based on the issues about which it is concerned. At the same time, as a national organisation able increasingly to draw upon our experiences of neighbourhood planning exercises across the country, our input can help communities reflect upon the special (heritage) qualities which define their area to best achieve aims and objectives for the historic environment. To this end information on our website might be of interest:

<http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

In addition, general guidance on Sustainability Appraisal and the historic environment is set out in Historic England's publication "Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment":

<http://www.historicengland.org.uk/images-books/publications/strategic-environmental-assessment-sustainability-appraisal-historic-environment/>.

Turning to our specific comments, we suggest treating landscape and the historic environment as separate matters. Both are substantial matters in their own right, worthy of separate consideration as they are subject to different issues. Taking the two together could lead to the masking of effects on one or the other.

We do not consider the number or location of listed buildings or the designation of the Conservation Area to be sustainability "issues" as such, but part of the baseline. The potential effects of new development on those heritage assets are, however, as recognised in the Scoping Report, a potential issue.



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The condition of these heritage assets may also be an issue. As noted in the Scoping Report, the Historic England Heritage at Risk Register does not include Grade II listed buildings outside London. However, we believe that the South Downs National Park Authority has undertaken a survey of the grade II listed buildings in the Park – are any of the grade II listed buildings in that part of the Plan area within the National Park identified as being at risk ? As no survey has apparently been undertaken of the condition of the Grade II listed buildings in that part of the Plan area outside the Park, this is rightly identified as a gap in the baseline.

Has there been any or is there any ongoing loss of character, particularly within the Conservation Area, through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation or insensitive streetworks ?

The third “key message” from the National Planning Policy Framework in sub-section 5.2 is a requirement for Local Plans rather than Neighbourhood Plans. If, however, this reference is to be retained then reference could also be made to the requirement in paragraph 157 of the Framework for local plans to contain a clear strategy for enhancing the historic environment.

Given that part of the Plan area lies within the South Downs National Park, particularly if this section is to continue to refer to landscape as well as the historic environment, then paragraph 115 of the National Planning Policy Framework should also be cited:

“Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.”

Although not “policy” as such, it might also be worth citing the National Planning Practice Guidance’s advice that Neighbourhood Plans should include enough information, where relevant, *“about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale”* and *“about local non-designated heritage assets including sites of archaeological interest to guide decisions”*.

According to the National Heritage List for England (<http://list.historicengland.org.uk/results.aspx?index=26>) Shillinglee Court is Grade II* listed and within the parish. We consider that it would be helpful to explain in more detail what the special interest of the Conservation Area (the reason for its designation) is in paragraph 5.3.1.

We welcome the reference to the as there been a characterisation of the Plan area as a whole ? Historic England considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan. We therefore suggest a characterisation study as a precursor to neighbourhood plans as



such a study can help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.

We welcome the reference to buildings of historic and local importance and the examples given, but is there an actual list of locally important buildings? If not, then this should also be identified as a gap in the baseline. We also welcome the reference to the Chichester Historic Environment Record but would also welcome a reference to the West Sussex Historic Landscape Character Assessment.

We welcome the proposed sustainability objective in sub-section 5.4. of the Report and the proposed Assessment Questions, although we would welcome an additional sub-objective "*Conserve and enhance archaeological remains, both scheduled and non-scheduled, including historic landscapes*".

We would expect the Scoping Report to set out the indicators or measures by which the policies and proposals of the Plan can be assessed against the objectives and sub-objectives. Appendix 4 of the Historic England advice on Strategic Environmental Assessments and the Historic Environment contains a range of possible indicators for assessing and monitoring the performance of the policies and proposals of the Plan against a historic environment objective. Not all of these will be relevant, but we suggest that the following be considered:

- the number and percentage of different heritage assets at risk;
- the percentage of planning applications where archaeological investigations were required prior to approval; and
- the percentage of planning applications where archaeological mitigation strategies were developed and implemented.

We hope these comments are helpful, but please contact me if you have any queries.

Thank you again for consulting Historic England.

Kind regards,



Martin Small
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(Bucks, Oxon, Berks, Hampshire, IoW, South Downs National Park and Chichester)

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