



Historic England

Mrs Beverley Weddell
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Our ref: HD/P5402/
Your ref:

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18th October 2017

Dear Mrs Weddell,

Plaistow and Ifold Neighbourhood Plan Pre-Submission Consultation Draft

Thank you for your e-mail of 7th September advising Historic England of the consultation on your Neighbourhood Plan. 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 assistance – the appendix to this letter contains links to this website and to a range of potentially useful other websites.

We welcome, in principle, “respecting the character” in the Vision but would like to see a specific reference to a “conserved and enhanced historic environment”. We welcome the reference to built heritage in paragraph 2.1, but we would prefer “historic environment” to reflect the fact that not all historic features are built. We welcome the first objective in paragraph 2.3 and the fourth objective in paragraph 2.5.

We welcome the descriptions of the historical development of the settlements in the parish in paragraphs 3.4 – 3.9. However, we feel that it could say a little more about the early development of the settlements and the parish as a whole, with reference to the West Sussex Historic Landscape Character Assessment and the Chichester Historic Environment Record.

There is also a lot of information in the Plaistow Conservation Area Character Appraisal, including reference to the remains of hammerponds in the valleys and other remains relating to the medieval iron industry, namely iron workings and lime kilns. The Appraisal also refers to the remains of twelve separate glassworks being also recorded in the area. All of these help give a sense of place for the parish and the settlements therein.



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The 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”.

According to our records, the parish has 62 listed buildings, including the Grade II* Shillinglee Court, one scheduled monument (the site of the Wephurst Glass House, one of the twelve glassworks to which the Conservation Area Character Appraisal refers) and the Plaistow Conservation Area. There is little information on the scheduling description for the Glass House so it would be interesting to “Enrich the List”; <https://www.historicengland.org.uk/listing/enrich-the-list/> by undertaking research into its history.

It would be helpful to say a little more about the conservation area; e.g. when it was designated, if the designation has been reviewed, what its special interest (the reason for designation) is, and the fact that there is a character appraisal and management plan for the area.

Is there a list of locally-important buildings and features ? Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity.

Is the condition of heritage assets in the parish an issue ? 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 buildings outside London. Has there been a survey of the condition of grade II buildings in the Plan area or 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, insensitive streetworks etc ?

We welcome, in principle, Policy EH1, although we would welcome clarification within the policy that harm (even if minimised) to a heritage asset will only be allowed in exceptional circumstances where there is clear and convincing justification and the development is necessary to achieve public benefits that outweigh the harm, in accordance with paragraphs 132, 133 and 134 of the National Planning Policy Framework.

The fourth and fifth insets of Policy EH2 rather duplicate each other. We would welcome the addition of “results in the loss of historic landscape features” as another inset. We would also welcome the addition of “historic” after “landscape” in the first sentence of Policy EH3. We welcome Policy EH4 as some of the Local Green Spaces identified are of historic significance.



We welcome, in principle, Policy EH5 for its recognition that excessive or poorly-designed lighting may adversely affect the special interest, character or appearance of historic buildings and/or the conservation area. However, it (and Policies EH4 and EH6) might need a little rewording to ensure that they conform with the requirement for planning policies in paragraph 154 of the National Planning Policy Framework that *“Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan”*.

The proposed housing site allocation at Land Opposite The Green is within the setting of the conservation area and there are a number of listed buildings within the wider vicinity. However, the site’s exclusion from the conservation area suggests that it does not make a significant contribution to the special interest, character or appearance of the area (unlike The Green itself and the fields to the north-east of the village).

We note that it is not identified in the Conservation Area Character Appraisal as making any particular contribution to the setting of the conservation area with no important views identified to, from or over the site (except one view from the east), probably due to the vegetation along the southern boundary of The Green which would be unaffected by the development of this site.

The Strategic Environmental Assessment notes that the *“site is currently well screened and relatively enclosed”*, but that *“development has the potential to affect the setting of the conservation area and listed building”*, and rather unhelpfully considers that the impact of the development of this site on the historic environment is *“uncertain”*.

However, given the lack of reference to the site in the Conservation Area Character Appraisal, it would appear to us that the development of the site need not have any significant adverse impact on the special interest, character or appearance of the conservation area.

The site is at a higher level than Rickman’s Lane and therefore development on the site could potentially be very visible (notwithstanding the SEA’s consideration that the site is *“well screened and relatively enclosed”*). However, this is more a landscape than a historic environment issue, although we agree with the SEA that the development of this site would affect the setting of Stone House to the west.

In accordance with Section 66 of the *Planning (Listed Buildings and Conservation Areas) Act 1991*, special regard has to be had to the desirability of preserving the setting of listed buildings. However, in our opinion, the site is large enough to accommodate 11 dwellings and to incorporate mitigation measures to reduce the impact on Stone House, as required by Policy H1. Also we do not consider that the site in its present open, undeveloped, state contributes particularly to the significance of Stone House.

Overall, therefore, subject to careful attention to design, layout and boundary treatment, we consider that the development of the proposed site Land Opposite The Green need not have an unacceptable impact on nearby designated heritage assets. We would, however, defer to



the opinion of Chichester District Council's Conservation Officer, who is likely to know the site and Plaistow better than ourselves and who should be consulted on this proposed allocation if s/he has not already.

Also, the assessment above has only considered designated heritage assets. Has the site been assessed for any non-designated archaeological interest with reference to the Historic Environment Record. Chichester District Council's Archaeologist should be consulted.

We welcome the requirement in Policy H2 that (re)development proposals within the Settlement Boundary for Ifold should not adversely affect any heritage assets, although we would prefer "the significance of any heritage assets".

We also welcome Policy H4 both for its purpose and as being in accordance with paragraph 58 of the National Planning Policy Framework, which states "*...neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics.*"

We note that the Ifold and Plaistow Village Design Statements provide the necessary "understanding and evaluation" of those settlements' "defining characteristics". We welcome these as 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. 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 would welcome a policy specifically for the conservation and enhancement of the historic environment of the Plan area, in accordance with the National Planning Practice Guidance advice to "*put broader strategic heritage policies from the local plan into action at a neighbourhood scale*".

Finally, three general observations. We think the Plan could be clearer in setting out in detail the issues affecting Plaistow and Ifold parish that the Plan's policies and proposals are intended to address. In our experience Neighbourhood Plans usually include a section on issues that have been identified through the community consultation process and/or higher level plans, which then inform and justify the Plan's policies and proposals.

We suggest that the distinction between the policies and their supporting text be clearer. We appreciate that the policies are in a different colour text, but it would be clearer if they were not numbered as paragraphs in the supporting text are.

Also, the preparation of the Neighbourhood Plan offers the opportunity to harness a community's interest in the historic environment by getting the community to help add to the evidence base, perhaps by the preparation of a comprehensive list of locally important

buildings and features, and/or a survey of Grade II listed buildings to see if any are at risk of neglect, decay or other threats.

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 Plaistow and Ifold, please do not hesitate to contact us.

Thank you again for consulting Historic England.

Yours sincerely,



Martin Small

Principal Adviser, Historic Environment Planning

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

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Appendix: Sources of Information



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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/known-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>

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>

