



ENGLISH HERITAGE

SOUTH EAST

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Winchester District Local Plan Part 1
c/o Strategic Planning
City Offices
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26th July 2012

Dear Ms Morton,

Submission of Winchester District Local Plan Part 1 – Joint Core Strategy

I write in response to the letter of 18th June from Mr Opacic of the City Council inviting comments on the Council's Schedule of Modifications and/or the publication of the National Planning Policy Framework. English Heritage is grateful for this opportunity to comment.

Proposed Modifications

English Heritage supports Proposed Modifications 28 and 137, which address the concerns we raised in respect of Policies DS1 and CP20 of the Pre-Submission Local Plan Part 1. Having discussed the other concerns we raised in respect of the Pre-Submission Local Plan Part 1 with the City Council, I understand that the Council will be proposing further modifications to the vision and Policies DS1 and MTRA1 to address more of our concerns, which English Heritage naturally welcomes and supports.

The National Planning Policy Framework

The National Planning Policy Framework explains that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. The Framework makes it clear that conserving and enhancing the historic environment is part of delivering sustainable development.

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Accordingly, the Framework requires local planning authorities to set out in their Local Plan a positive strategy for the conservation and enjoyment, and strategic policies to deliver the conservation and enhancement, of the historic environment. The positive strategy should include heritage assets most at risk through neglect, decay or other threats. Local Plans should take into account the desirability of putting heritage assets to a viable use consistent with their conservation; the contribution conservation makes to wider sustainability aims; and the desirability of new development contributing to local character.

When commenting on the Pre-Submission Local Plan Part 1 I largely welcomed and supported Policy CP20 (Heritage and Landscape Character) but suggested an addition which I am pleased to see that the Council is proposing (Proposed Modification 137). However, the Policy now needs to be considered against the requirements of the National Planning Policy Framework. English Heritage disagrees with the Planning Advisory Service and considers that the Framework has introduced stronger requirements for Local Plans in respect of the historic environment.

Whilst undoubtedly a strategic policy, and one that offers protection for the District's historic environment. English Heritage is not convinced that Policy CP20 goes far enough to actively deliver the conservation and enhancement of the historic environment. It is a reactive policy, directed more at development proposals than heritage assets, rather than a proactive policy to actively secure the conservation and enhancement of the historic environment. The policy says nothing about what the City Council will do if no development proposals come forward.

It can be contrasted with Policy 16 of the Central Lancashire Core Strategy, which was recently found to be sound (and thus compliant with the National Planning Policy Framework):

Protect and seek opportunities to enhance heritage assets, by:

- a) Safeguarding heritage assets from inappropriate development.*
- b) Supporting development or other initiatives where they protect and enhance the local character, setting, management and historic significance of heritage assets, with particular support for initiatives that will improve any assets that are recognised as being in poor condition.*
- c) Identifying and adopting a local list of heritage assets for each Authority.*

Other positive, proactive measures that could be included in Policy CP20, for example, are a commitment to conservation area appraisals and management plans (particularly given the 19 conservation areas at risk within the district) or a more committed approach to tackling the buildings and scheduled monuments at risk within the district.

In respect of the requirement for a positive strategy for the conservation and enjoyment of the historic environment, this should be fundamentally provided by a robust strategic policy or policies supplemented by detailed locality- or asset- specific policies. Policy CP20 is, of course, supported by Saved Local Plan Policies HE1, HE2, HE4 – HE12, HE14, HE17 until these are replaced in due course through the Local Plan Part 2.

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However, in addition to these strategic and detailed policies, a robust positive strategy should be expected to include recognition of the historic environment throughout the Plan. English Heritage considers that, with the additional modifications it understands are to be proposed by the City Council, there would be sufficient references within the Local Plan Part 1 to form the basis of that positive strategy. Nevertheless, the need is still there for a robust positive, proactive strategic historic environment policy and, as explained above, English Heritage does not consider Policy CP20 to match up to this requirement.

In summary, therefore, English Heritage considers that the City Council has not quite fully embraced the spirit and requirements of the National Planning Policy Framework in respect of the historic environment. We consider that, in order to be fully consistent with the Framework in this respect, positive measures for the conservation and enhancement of the historic environment need to be incorporated into Policy CP20.

Given the acknowledged rich and diverse historic heritage of Winchester District, this situation is, in my view, significant. It is also important as Neighbourhood Plans are only required by the National Planning Policy Framework to be in accordance with the strategic policies of the Local Plan, so it is vital to ensure that those strategic policies are robust in themselves.

English Heritage is reluctant to consider the Local Plan Part 1 unsound, given the late stage it has reached and its previous support for Policy CP20, but there is now a new adopted national planning policy framework in place and English Heritage is duty bound to ensure that its provisions in respect of the historic environment are fully met in emerging Local Plans. We are not convinced this is the case with the Local Plan Part 1, nor, therefore, are we convinced that it is fully consistent with the National Planning Policy Framework.

English Heritage does not consider it necessary from its perspective to request to appear at the Examination to give oral evidence on these matters, but would of course be prepared to do so, or provide a further statement, should the Inspector feel that this would be of assistance.

Thank you.

Yours sincerely,



Martin Small
Planning Advisor

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