

Winchester District Local Plan Part 2 – Development Management and Site Allocations

Examination – July 2016

Statement of Common Ground with

Historic England

Library Reference : WCC SCG 01



Statement of Common Ground with Historic England

Historic England (rep 50084) submitted a number of representations to LPP2, both in support and covering general and policy specific matters. Following discussions with Historic England the following amendments to LPP2 have been agreed:-

Section/para/policy ref	Summary of comment	Agreed approach
1.13	Add Historic England to list of organisations referred to	Amend 1.13 to include Historic England
Policy WIN3	The Council needs to undertake further work to ensure that its approach to protecting important views is robust.	Agreed that WIN3 provides a suitable framework for the consideration of impacts, but acknowledge the need for further assessments in the future. HE have offered to assist with this process. The matter of views was covered in some detail in the report to Cabinet (CAB2721(LP)) October 2015 Appendix M (paras 72-79).
WIN4 + WIN7	Inconsistency with wording referring to archaeological remains	Replace references to archaeology with : <i>“include an archaeological assessment to define the extent and significance of any archaeological remains and reflect these in the proposals”</i>
BW1	concerned at the reference to “recording” as it suggests that the Council may be prepared to accept the loss of part of the Park Lug	Park Lug lies adjacent to the southern boundary to this site. Policy BW1 requires a link from the site to the public right of way which coincides with the Park Lug feature. To ensure consistency with other policies in LPP2 amend reference to read <i>“Developers will be expected to undertake necessary assessments to define the extent and significance of the Park Lug and reflect these in the proposals”</i> .
	SA fails to recognise the historic significance of the Palace, Deer Park and Park Lug	See above. Sustainability objective 12 ‘Heritage’ refers to <i>‘to protect and enhance built and cultural heritage’</i> , therefore each policy has been assessed against this and the other sustainability objectives. The SA includes reference to the Palace etc in Appendix VI, and refers to Policy CP20 of LPP1 to provide the policy

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		<p>framework for the consideration of effects.</p> <p>LPP2 also includes a number of Heritage policies to require the necessary details to be submitted with planning applications.</p>
BW2	Should refer to Park Lug	<p>Park Lug does not lie in close proximity to this allocation and therefore it is not referred to in the Policy or supporting text. No change required.</p>
	SA fails to recognise the historic significance of the Palace, Deer Park and Park Lug	<p>See above.</p> <p>Sustainability objective 12 ‘Heritage’ refers to ‘<i>to protect and enhance built and cultural heritage</i>’, therefore each policy has been assessed against this and the other sustainability objectives. The SA includes reference to the Palace etc in Appendix VI, and refers to Policy CP20 of LPP1 to provide the policy framework for the consideration of effects.</p> <p>LPP2 also includes a number of Heritage policies to require the necessary details to be submitted with planning applications.</p>
BW4	Concerned at the reference to “recording” as it suggests that the Council may be prepared to accept the loss of part of the Park Lug	<p>Park Lug lies adjacent to the western boundary to this site. Policy BW4 requires a pedestrian/cycle link to the adjacent site. The Council’s archaeologist has advised a ‘zone’ within which this link could be achieved with least impact on Park Lug which is of variable quality along this boundary. To ensure consistency with other policies in LPP2 amend reference to read “<i>Developers will be expected to undertake necessary assessments to define the extent and significance of the Park Lug and reflect these in</i></p>

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		<p><i>the proposals”.</i></p>
BW5	<p>Concerned at the reference to “recording” as it suggests that the Council may be prepared to accept the loss of part of the Park Lug</p>	<p>See above.</p> <p>Sustainability objective 12 ‘Heritage’ refers to ‘<i>to protect and enhance built and cultural heritage</i>’, therefore each policy has been assessed against this and the other sustainability objectives. The SA includes reference to the Palace etc in Appendix VI, and refers to Policy CP20 of LPP1 to provide the policy framework for the consideration of effects.</p> <p>LPP2 also includes a number of Heritage policies to require the necessary details to be submitted with planning applications.</p> <p>Park Lug lies adjacent to the eastern boundary to this site Policy BW5 requires a pedestrian/cycle link to the adjacent site. The Council’s archaeologist has advised a ‘zone’ within which this link could be achieved with least impact on Park Lug which is of variable quality along this boundary. To ensure consistency with other policies in LPP2 amend reference to read “<i>Developers will be expected to undertake necessary assessments to define the extent and significance of the Park Lug and reflect these in the proposals”.</i></p>

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	SA fails to recognise the historic significance of the Palace, Deer Park and Park Lug	<p>See above.</p> <p>Sustainability objective 12 'Heritage' refers to '<i>to protect and enhance built and cultural heritage</i>', therefore each policy has been assessed against this and the other sustainability objectives. The SA includes reference to the Palace etc in Appendix VI, and refers to Policy CP20 of LPP1 to provide the policy framework for the consideration of effects.</p> <p>LPP2 also includes a number of Heritage policies to require the necessary details to be submitted with planning applications.</p>
CC1	Policy should include reference to archaeology	<p>The historic environment assessment undertaken to inform LPP2, identifies 'archaeological potential' in the vicinity of CC1. To be consistent with other LPP2 policies where there is 'potential' this matter is reflected in the supporting text, but where there is a 'known' resource, then it is agreed this should be referred to in the policy. Detailed matters are covered by Policy DM25.</p> <p>Agreed reference in para 4.3.18 to read "<i>...the preparation of an archaeological assessment will be needed to define the extent and significance of any archaeological remains and reflect these in the proposals, in accordance with Policy DM25 prior to the commencement of development</i>"</p>

Section/para/policy ref	Summary of comment	Agreed approach
	Concerned SA refers to neutral impact	<p>See above</p> <p>Sustainability objective 12 ‘Heritage’ refers to ‘<i>to protect and enhance built and cultural heritage</i>’, therefore each policy has been assessed against this and the other sustainability objectives.</p> <p>The SA does refer to anticipated effects on heritage matters being neutral, and qualifies this by reference to the need to refer to site specific requirements – see proposed amendments to para 4.3.18.</p> <p>LPP2 also includes a number of Heritage policies to require the necessary details to be submitted with planning applications.</p>
KW1	Policy should include reference to archaeology	<p>See above response to CC1</p> <p>Agreed amend para 4.4.14 to read <i>“the site lies within an area of high archaeological potential relating to Iron Age/Roman settlement. The preparation of an archaeological assessment will be needed to define the extent and significance of any archaeological remains and reflect these in the proposals”</i></p>
	Concerned SA refers to neutral impact	<p>Sustainability objective 12 ‘Heritage’ refers to ‘<i>to protect and enhance built and cultural heritage</i>’, therefore each policy has been assessed against this and the other sustainability objectives.</p> <p>See above proposed amendments to para 4.4.14</p> <p>LPP2 also includes a number of Heritage policies to require the necessary details to be submitted with planning applications.</p>

Section/para/policy ref	Summary of comment	Agreed approach
NA3	Policy should include reference to archaeology	<p>See above response to CC1</p> <p>Agreed amend para 4.5.23 to read and the <i>archaeological potential of the area will need an assessment to define the extent and significance of any archaeological remains and reflect these in the proposals, in accordance with Policy DM25 prior to the commencement of development</i>".</p>
	Concerned SA refers to neutral impact	<p>Sustainability objective 12 'Heritage' refers to '<i>to protect and enhance built and cultural heritage</i>', therefore each policy has been assessed against this and the other sustainability objectives.</p> <p>See above proposed amendments to para 4.5.23</p> <p>LPP2 also includes a number of Heritage policies to require the necessary details to be submitted with planning applications.</p>
SW1	Policy should include reference to archaeology	<p>See above response to CC1</p> <p>Add following to para 4.6.15/16 to read "<i>The site lies within an area of archaeological potential, the preparation of a archaeological assessment will be needed to define the extent and significance of any archaeological remains and reflect these in the proposals, in accordance with Policy DM25 prior to the commencement of development</i>".</p>
	Concerned SA refers to neutral impact	<p>Sustainability objective 12 'Heritage' refers to '<i>to protect and enhance built and cultural heritage</i>', therefore each policy has been assessed against this and the other sustainability objectives.</p> <p>See above proposed amendments</p>

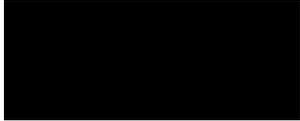
Section/para/policy ref	Summary of comment	Agreed approach
		<p>to para 4.6.15/16</p> <p>LPP2 also includes a number of Heritage policies to require the necessary details to be submitted with planning applications.</p>
WK3	Note the reference in policy to known and potential archaeological features	<p>Clarify para 4.8.26 to delete reference to recording and replace with 'assessment' and refer to DM25.</p> <p>Amend final sentence to read “<i>Archaeological excavation and assessment will be required, in the southern part of the site prior to housing development taking place, in accordance with DM25</i>”.</p>
	Would have expected the SA to identify potential negative effects	<p>See above changes to 4.8.26</p> <p>LPP2 also includes a number of Heritage policies to require the necessary details to be submitted with planning applications.</p>
Para 6.2.27 / DM4	Clarify reference to 'recognised heritage value'	<p>To be consistent with other matters listed suggested 'recognised' is deleted, as the list provides general guidance to the potential benefits and services offered by open areas, whether these are on definitive lists or not.</p> <p>Amend para 6.2.27 3rd bullet delete 'recognised'</p>
DM21	Refer to historic parks and gardens (2 nd bullet)	<p>Bullet (ii) is not intended to be a comprehensive list, therefore add reference to historic parks and gardens/battlefields in supporting text at para 6.4.54</p> <p>Amend bullet (ii) to read “...development would affect listed buildings, Conservation Areas, or sites of archaeological importance <u>heritage assets</u> or sites of ecological importance”.</p>

Section/para/policy ref	Summary of comment	Agreed approach
DM22	Potential impacts on the significance of heritage assets are not limited to visual impact	This policy focuses on rural character and heritage is appropriately referred to under 'visual' to cover the setting of heritage assets in rural locations. Effects on the significance of heritage assets are covered in detail by Policies DM24-30.
DM25	Refer to desk based assessment	Amend first bullet to read " <i>the result of desk based assessment ...</i> "
DM26	Request "has an acceptable impact on character" instead of "limits their impact on character" in (d).	Amend bullet (d) to read " <i>incorporate any energy efficiency or energy regeneration measures into the design of the proposals in a manner that has an acceptable impact on character</i> ".
DM28	that the Policy needs clarifying – as written the (total) loss of a designated heritage asset may be permissible (only in exceptional circumstances) but unacceptable harm is not permissible (in any circumstances). We suggest that the Policy make it clear that substantial harm to or the loss of any higher grade designated asset will only be permissible in wholly exceptional circumstances and that substantial harm to or loss of other designated heritage assets will only be permissible in exceptional circumstances.	Amend first paragraph to read " <i>The loss of designated heritage assets will only be permitted in exceptional circumstances, or in the case of higher grade heritage assets in wholly exceptional circumstances. Works which would cause unacceptable harm to the special interest of heritage assets, or their setting, or would lead to the unsympathetic subdivision of their grounds, will only be permissible in exceptional circumstances, or in the case of higher grade heritage assets in wholly exceptional circumstances</i> "
DM29	Clarify what is meant by 'beneficial use' in criterion iii). Clarify criterion iii)	Amend iii) to read "involve a building that is capable of accommodating the proposed change of use...."

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DM30		To clarify the intention of the policy pending preparation of a local list amend first sentence to read “ <i>where planning permission is required for buildings or structures that have been identified as a locally significant heritage asset...</i> ”
Paras 6.4.68 – 6.4.121	Various minor suggestions	<p>Agree following amendments:</p> <p>6.4.70 “Statutorily” should be “statutory”;</p> <p>6.4.82 ‘need’ should be “needs”.</p> <p>last sentence of paragraph 6.4.93: “The Council will proactively seek solutions for assets at risk through discussions with owners and willingness to consider positively development schemes that would ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers to prevent the unnecessary loss of such buildings”.</p> <p>6.4.95 replace “special interest” with ‘significance’ in first sentence</p> <p>6.4.96 insert “against the importance of the asset” before ‘and the public benefits’</p>
Appendix C	Clarify intention of scoring system referred to.	Update and clarify Appendix C - through moving the notes to above the table

In addition to these representations, Historic England made a number of detailed comments in relation to para's/policy - 2.26, 3.1.2, 3.7.1, WIN7, 4.3.1, 4.5.1, 4.8.1, 6.4.25 and DM15, but considers none of these, in its opinion, affect the soundness of the Plan.

Historic England confirms that its concerns have been addressed by the proposed amendments and considers LPP2 to be sound.



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