

The Clerk
Boxgrove Parish Council
2, McAdam Close
Hambrook, PO18 8FG

Our ref: HD/P5402/
Your ref:
Telephone 01483 252040
Fax

25th October 2017

Dear Sir or Madam,

Boxgrove Neighbourhood Plan Reg 14 consultation

Thank you for your e-mail of 20th September advising Historic England of the consultation on the BoxgroveNeighbourhood Plan. We are pleased to make the following general and detailed comments now.

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.

In sub-section 2.1.1 reference should also be made to 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.*”

In sub-section 2.1.2, the South Downs National Park Authority is the planning authority for the area of the Park, not Chichester District Council, although the Park Authority chooses to exercise its planning authority function through an agency agreement with the District Council.



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We welcome the snapshot of the history of Boxgrove parish in section 3, although we would like to see a greater explanation of the historical development of the settlements in sub-section 3.1, particularly from the Middle Ages until today. It would be helpful to explain a little more about the listed buildings in the parish in sub-section 3.3.4 e.g. their ages, their architectural styles and their spatial distribution, which would be best shown on a map.

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It would be helpful to explain when the conservation areas were designated, whether or not the designations have been reviewed, what their special interest (the reason for designation) is and the date of their character appraisals and/or management plans. It would also be helpful to show their boundaries on a map.

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”.

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. Have the Chichester Historic Environment Record and West Sussex Historic Landscape Character Assessment been consulted, the former for non-scheduled archaeological sites, some of which may be of national importance?

Is the condition of heritage assets in the parish an issue? There are no heritage assets within the parish on Historic England’s Heritage at Risk Register, but the Register does not include grade II secular buildings outside London. We are aware that the South Downs National Park Authority has undertaken a survey of Grade II listed buildings to ascertain whether any are at risk of neglect, decay or other threats – are there any at risk in that part of the Plan area within the Park? Has there been a survey of the condition of grade II buildings in the remainder of the Plan area? 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 would like to see a reference to the historic environment of the parish being conserved and enhanced in the Vision and whilst we welcome Objective 1, we would prefer to see specific mention of the historic environment in the first objective as the



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terms “built environment” and “historic environment” are not interchangeable. Not all heritage assets are built and the National Planning Policy Framework refers to the historic environment (distinguishing it from the built environment in paragraph 7) and specifically defines the “historic environment”. We would also like the first sub-objective under “Environment” to be “conserving and enhancing the character.....”. We welcome the fifth Environment sub-objective.

We welcome Policy EH1 as trees and hedgerows are often components of historic landscapes. In fact, we would like to see “or historic” after “arboricultural and amenity” to reflect this point.

We welcome criteria b) and c) of Policy EH2, although we would prefer the siting of the energy-generating infrastructure and its scale and design to avoid any harmful impacts on the significance of heritage assets, bearing in mind that the National Planning Policy Framework recognises that development within the setting of heritage assets can be harmful to their

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significance (paragraphs 129 and 132), and that S.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be had to preserving the setting of listed buildings. We would also prefer c) to read “.....*environment and the special interest, character and appearance of the conservation areas of the Parish*”.

We welcome Policy EH6 in principle, although we feel that it rather confuses impact on landscape character and visual impact. The two are different considerations, as recognised in the Guidelines for Landscape and Visual Impact Assessment, published by the Landscape Institute.

Not allowing any development that caused any loss or diminution any of these views is very strict and it might be better to say something like “*Development should preserve the attributes of views and vistas that contribute to the character, appearance and special interest of the conservation areas or to the significance, or appreciation of that significance, of heritage assets*”.

We also welcome Policy EH8 both in its own right and as being 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*”. However, the policy should refer to the significance of heritage assets, as significance is the essence of such assets and reflects what is important about them.

We presume that Policy EE4 is intended to prevent changes of use of land in agricultural or horticultural or equine or viticultural employment use to other uses. However, as currently written, the policy also presumes against changes of use of land in agricultural or horticultural or viticultural use to equine use, which would presumably be acceptable to the Parish Council.



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We welcome the fifth criterion of Policy EE5.

We have previously noted that paragraph 58 of the National Planning Policy Framework 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 therefore welcome Policy H1 in principle, but to be comprehensive, we consider that it should provide greater guidance on building form, materials, heights etc.

Also, Is the policy underpinned by the required “understanding and evaluation” of the Plan area’s “defining characteristics”. Is there, for example, a Village Design Statement ? We note that the heading to sub-section 3.3.3 is “Heritage and Character”, that the Vision refers to “rural character” and that the first sub-objective under “Environment” refers to the character of the Parish’s built environment, but whilst we are aware that there are character appraisals for the Boxgrove and Halnaker Conservation Areas. has there been any characterisation exercise for the Plan area as a whole ?

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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. The appendix to this letter contains links to further information on characterisation and we would be pleased to offer further information on this matter.

We welcome criteria i), iii) and viii) (ix) of Policy H3, although we would like to see criterion viii) require the development proposals to be informed by the archaeological (and environmental) surveys.

We note that Site 7 Land at The Old Granary, Boxgrove is adjacent to the Boxgrove Conservation Area. We further note that the Boxgrove Conservation Area Townscape Appraisal Map identifies an important view across this land. The proposed allocation of this site for housing therefore seems rather at odds with Policy EH6, although we note that this view is not specifically referred to in the text of the Conservation Area Appraisal.

The extent to which this view contributes to the special interest, character and appearance of the Conservation Area is limited and, in any event, it would appear



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possible to retain the view through the careful design of the development. We therefore agree with the conclusions of the Heritage Impact Assessment (which we welcome) that, if developed sensitively, the development of this site need not detract from the positive qualities of the Conservation Area. We also agree with the conclusions of the Assessment that there would be no unacceptable impact on the setting or significance of Boxgrove Priory Scheduled Monument or the Grade II listed Priory Farmhouse. We therefore raise no objection to the allocation of Site 7.

Site 10 Brambles, Crockerhill is close to the Grade II listed Crockerhill House, but we consider that the development of this site would not necessarily have an unacceptable impact on the setting of this listed building and therefore raise no objection to the allocation of Site 10. We note that Site 8 The Old Coal Yard, Halnaker, already benefits from planning permission.

Finally, two general observations. We think the Plan could be clearer in setting out in detail the issues affecting Boxgrove 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.

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 inputting to the preparation of a comprehensive list of locally important buildings and features, and/or a survey of Grade II listed buildings outside the National Park to see if any are at risk of neglect, decay or other threats.

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In summary, as regards the historic environment, Historic England is satisfied that the Boxgrove Neighbourhood Plan satisfies the basic conditions, with the possible exception of a lack of "understanding and evaluation" of Boxgrove's "defining characteristics" outside the conservation areas required by the National Planning Policy Framework.

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 Boxgrove, please do not hesitate to contact us.

Thank you again for consulting Historic England.

Yours faithfully,



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Appendix: Sources of Information

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 .



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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>



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